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<p style="text-align: right;">Page 4</p> <p>1 THE VIDEOGRAPHER: We are now on.  2 the record.  3 Today's date is February 9, 2021,  4 and the time is 10:13 a.m. Eastern.  5 This is the recorded video  6 deposition of Lisa Barbounis in the  7 matter of Lisa Barbounis versus MEF, et  8 al, in the United States District Court  9 of the Eastern District of Pennsylvania,  10 Civil Action Number 2:19-CV-05030-JDW.  11 My name is Paul D'Ambria from  12 Everest Court Reporting. I'm the video  13 specialist.  14 The court reporter today is Joyce  15 Wise, also with Everest Court Reporting.  16 All counsel appearing today will  17 be noted on the stenographic record.  18 Will the court reporter please  19 swear in the witness?  20 LISA REYNOLDS BARBOUNIS,  21 called upon by Defendant to give testimony, being  22 duly sworn or affirmed by me, testified as  23 follows:  24 * * * * *</p>	<p style="text-align: right;">Page 6</p> <p>1 instructions that we talked about last time  2 before we start.  3 You remember last time I told you  4 that if you need to take a break at any point in  5 time today, you should feel absolutely free to do  6 so.  7 The only thing I would ask is if  8 there is a question pending, that we complete the  9 answer to that question before we break.  10 I will tell you today that I am  11 somewhat under the weather myself, so I'm going  12 to need to ask you for the same courtesy.  13 I can tell you that I'm certainly  14 going to need to take my own share of breaks  15 today.  16 So I will -- I'll try to keep them  17 as short, but hopefully, you know, I would ask  18 you for the same consideration in terms of when  19 and how we need to break.  20 So as I said before, your first  21 deposition in this case was November 4th.  22 Do you recall that deposition?  23 A. Yes.  24 Q. Did you -- have you read your</p>
<p style="text-align: right;">Page 5</p> <p>1 MR. CAVALIER: Seth, are you ready  2 to go?  3 MR. CARSON: Yes.  4 EXAMINATION  5 BY MR. CAVALIER:  6 Q. Good morning, Ms. Barbounis.  7 It's good to see you again.  8 A. Hello.  9 Q. As you recall, my name is John  10 Caviler. I'm a lawyer with Cozen O'Connor and I  11 represent the Middle East Forum and Greg Roman.  12 We're here today to re-open your  13 deposition. It seems every time you and I sit  14 down to talk, there's some big political news  15 going on.  16 The last as I seem to recall, it  17 was the election. Today it's impeachment.  18 It's been, I guess, what, three  19 months or so since your last deposition?  20 It was on November 4th. And I  21 know that you've given other testimony in this  22 case.  23 But just for the sake of the  24 record, I'll run you through some of the same</p>	<p style="text-align: right;">Page 7</p> <p>1 deposition transcript?  2 A. No.  3 Q. Any particular reason why not?  4 A. I mean, I know what happened, so  5 there's no reason to.  6 Plus, I don't want to re-live  7 that.  8 Q. Okay. So, again, like we talked  9 about last time, let's try not to talk over each  10 other today since we're on video as opposed to  11 sitting down at a conference table.  12 The court reporter's life is hard  13 enough trying to do this when we're all in the  14 same room, it's doubly hard over Zoom.  15 So for her sake, and for all of  16 our sanities, I'll do my very best not to cut you  17 off or interrupt your answers.  18 And I'd ask you to try to wait for  19 me to state my question before you begin your  20 answer, just so there's a clear record.  21 You're represented today by Mr.  22 Carson again.  23 Is that correct?  24 A. Yes.</p>

<p>Page 8</p> <p>1 Q. Okay. Did you prepare at all for</p> <p>2 today?</p> <p>3 A. No.</p> <p>4 Q. Did you speak to Mr. Carson at any</p> <p>5 point in the last several days about your</p> <p>6 deposition?</p> <p>7 A. Not about my deposition, except</p> <p>8 for what time it was and a Zoom and to make sure</p> <p>9 that I was on time.</p> <p>10 But I talk to him all the time.</p> <p>11 Q. Okay. So did you review any</p> <p>12 documents for today?</p> <p>13 A. No.</p> <p>14 Q. Did you review any of your prior</p> <p>15 testimony -- well, let me back up and ask you</p> <p>16 about your prior testimony.</p> <p>17 So we've established that you were</p> <p>18 deposed by me on November 4th in this matter.</p> <p>19 It's my understanding you've also</p> <p>20 given testimony in what I will refer to as the</p> <p>21 trade secrets action, which I'm about to define.</p> <p>22 We talked a little bit about this</p> <p>23 last time.</p> <p>24 Do you know what I'm referring to</p>	<p>Page 10</p> <p>1 testimony that you gave in that case, have you</p> <p>2 given any other sworn testimony with respect to</p> <p>3 the Middle East Forum in any way?</p> <p>4 A. Yes, I have.</p> <p>5 Q. Can you tell me about that?</p> <p>6 A. What would you like to know about</p> <p>7 it?</p> <p>8 Q. When did it occur?</p> <p>9 A. Oh, I do know when it occurred,</p> <p>10 the day after the attack on my work -- attack on</p> <p>11 the Capitol.</p> <p>12 Q. Okay. And was that a deposition?</p> <p>13 A. I believe so, yes.</p> <p>14 Q. Okay. Do you remember who took</p> <p>15 your deposition on that day?</p> <p>16 A. A woman.</p> <p>17 Q. Was that Molly DiBianca?</p> <p>18 A. Yes, that's her name.</p> <p>19 Q. Have you reviewed that transcript</p> <p>20 since you gave that deposition?</p> <p>21 A. No, I have not. It's been pretty</p> <p>22 hectic since the attack on the Capitol.</p> <p>23 Q. Okay. Okay. So, again, just</p> <p>24 going back to the instructions, you're</p>
<p>Page 9</p> <p>1 if I refer to the trade secrets action?</p> <p>2 A. Yes. One of the many frivolous</p> <p>3 lawsuits that have been filed against me.</p> <p>4 Q. Okay. So we'll talk about that in</p> <p>5 a second.</p> <p>6 But that's the case before Judge</p> <p>7 Sanchez in which the Middle East Forum has</p> <p>8 brought claims against you alleging that you</p> <p>9 misappropriated trade secrets and the like.</p> <p>10 Correct?</p> <p>11 A. That they did bring that case</p> <p>12 against me? That's correct.</p> <p>13 Q. Okay. And so when we refer to the</p> <p>14 trade secrets action, we're all in agreement that</p> <p>15 we're referring to that particular action before</p> <p>16 Judge Sanchez.</p> <p>17 A. Yes, we're all on the same page.</p> <p>18 Q. Okay. My understanding is you</p> <p>19 gave testimony in that case, is that correct?</p> <p>20 A. I believe so.</p> <p>21 They're all blurring together now,</p> <p>22 but, yes, I believe so.</p> <p>23 Q. Okay. Other than the deposition</p> <p>24 that we did together on November 4th and the</p>	<p>Page 11</p> <p>1 represented here today by Seth Carson.</p> <p>2 As you'll remember from the last</p> <p>3 time and from your various experience giving</p> <p>4 testimony and doing these depositions, there'll</p> <p>5 be some objections today.</p> <p>6 To the extent Mr. Carson has an</p> <p>7 objection, we'll both try to allow him to</p> <p>8 verbalize the objection for the record.</p> <p>9 But as always, unless he instructs</p> <p>10 you not to answer, you're still expected to</p> <p>11 answer the question, subject to his objection.</p> <p>12 Is that fair?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Any particular reason why</p> <p>15 you're unable to tell me the truth today?</p> <p>16 A. No, I can always tell the truth</p> <p>17 and I always do.</p> <p>18 Q. Any medication that would prevent</p> <p>19 you from telling the truth or affect your</p> <p>20 recollection?</p> <p>21 A. No, sir.</p> <p>22 Q. Okay. So since we touched on it</p> <p>23 earlier, let me ask you a little bit about this</p> <p>24 trade secrets action.</p>

<p style="text-align: right;">Page 12</p> <p>1 You said it was a frivolous case?</p> <p>2 A. Correct.</p> <p>3 Q. What do you mean by that?</p> <p>4 A. It's a case that was brought only</p> <p>5 in retaliation against me for filing this claim</p> <p>6 against Greg Roman.</p> <p>7 But it would have never happened</p> <p>8 if they didn't do that. And a lot of what is</p> <p>9 accused of me in there is not only fabricated,</p> <p>10 but twisted into something nefarious.</p> <p>11 Q. And you're aware, correct, that as</p> <p>12 part of the hearing in that case -- let's strike</p> <p>13 that.</p> <p>14 You gave testimony in the hearing</p> <p>15 before Judge Sanchez where he considered the</p> <p>16 Middle East Forum's motion for a preliminary</p> <p>17 injunction, correct?</p> <p>18 A. Correct.</p> <p>19 Q. And are you aware that he issued</p> <p>20 an opinion after that hearing making certain</p> <p>21 rulings in that case?</p> <p>22 A. I heard about it, but I haven't</p> <p>23 read it.</p> <p>24 Q. Okay. So I want to ask you some</p>	<p style="text-align: right;">Page 14</p> <p>1 discrimination that was filed.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Are you familiar with the</p> <p>4 complaint that you filed in this case?</p> <p>5 A. I'm familiar with them, yes.</p> <p>6 Q. Have you read it?</p> <p>7 A. Which one?</p> <p>8 Q. The latest amended complaint that</p> <p>9 you filed.</p> <p>10 A. Yeah -- I discussed them with Seth</p> <p>11 on the phone and then I signed them.</p> <p>12 Q. Okay. Have you read it though?</p> <p>13 MR. CARSON: Asked and answered.</p> <p>14 THE DEPONENT: I don't know.</p> <p>15 Maybe. There's so many papers. I am</p> <p>16 honestly so busy.</p> <p>17 You have no idea how busy I am --</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. I didn't get the last part of your</p> <p>20 answer. I'm sorry.</p> <p>21 A. I have so many -- there's so many</p> <p>22 things, like I have no idea what I read, what I</p> <p>23 didn't. There's claims coming in that I, you</p> <p>24 know -- there's all kinds of stuff happening in.</p>
<p style="text-align: right;">Page 13</p> <p>1 questions about that opinion and to see if it</p> <p>2 affects your view that the case that the Middle</p> <p>3 East Forum filed was frivolous.</p> <p>4 But before I do that, you</p> <p>5 mentioned that it was brought only -- and I don't</p> <p>6 want to put words in your mouth, Seth will</p> <p>7 correct me, you said earlier that it was brought</p> <p>8 only because of your action against the Forum?</p> <p>9 A. Correct.</p> <p>10 Q. So just to clarify that, it's your</p> <p>11 belief -- I'll ask the question.</p> <p>12 Is part of your retaliation claim</p> <p>13 in this case the fact that the Forum filed that</p> <p>14 lawsuit against you?</p> <p>15 MR. CARSON: Objection.</p> <p>16 THE DEPONENT: I don't understand</p> <p>17 the question. Say that again?</p> <p>18 MR. CARSON: Can you guys hear me?</p> <p>19 THE DEPONENT: Yeah, we can hear</p> <p>20 you, Seth.</p> <p>21 MR. CARSON: I'm going to object,</p> <p>22 because it calls for a legal conclusion.</p> <p>23 The civil action complaint speaks for</p> <p>24 itself. So does the second charge of</p>	<p style="text-align: right;">Page 15</p> <p>1 And like I said, I have two little</p> <p>2 kids and an exhausting job. And I don't have</p> <p>3 time to, you know, go over -- go over everything</p> <p>4 with a fine toothed comb, so...</p> <p>5 Q. Okay. So you talked about the</p> <p>6 complaint with Seth, but you don't know if you</p> <p>7 read it?</p> <p>8 A. I might have. I might not. I</p> <p>9 don't remember honestly.</p> <p>10 Q. Okay. Do you know whether part of</p> <p>11 your claim for retaliations against the Middle</p> <p>12 East Forum is derived from the fact that they</p> <p>13 filed that trade secrets action against you?</p> <p>14 MR. CARSON: Objection. Calls for</p> <p>15 a legal conclusion. The complaint, the</p> <p>16 charge of discrimination speak for</p> <p>17 themselves.</p> <p>18 She can answer to the extent she</p> <p>19 understands the questions, understands</p> <p>20 the law.</p> <p>21 THE DEPONENT: I don't know about</p> <p>22 the law. But I know that they are</p> <p>23 ongoing harassing me.</p> <p>24 I mean, we have a private</p>



<p style="text-align: right;">Page 16</p> <p>1 detective following me around from the</p> <p>2 Middle East Forum that has identified</p> <p>3 himself as such to multiple people that</p> <p>4 I know.</p> <p>5 So they are continuing to harass</p> <p>6 me over and over and over again.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. Well, let's talk about that then</p> <p>9 for a second.</p> <p>10 You said that you have a private</p> <p>11 detective following you around, but talking to</p> <p>12 other people about you?</p> <p>13 A. Correct.</p> <p>14 Q. Let me break that down.</p> <p>15 How is there a private detective</p> <p>16 following you around? What do you mean by that?</p> <p>17 MR. CARSON: Object to form. How</p> <p>18 is a private detective following you</p> <p>19 around, you can answer if you understand</p> <p>20 the question.</p> <p>21 THE DEPONENT: So people that,</p> <p>22 like, I don't -- that I hardly interact</p> <p>23 with at all -- you know, you guys have</p> <p>24 asked me in deposition about other people</p>	<p style="text-align: right;">Page 18</p> <p>1 THE DEPONENT: Sky and a couple</p> <p>2 other people. I can't remember their</p> <p>3 names exactly.</p> <p>4 But there was another guy that</p> <p>5 said that he was contacted.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Who's Steve?</p> <p>8 A. A friend of mine.</p> <p>9 Q. Did he tell you that directly?</p> <p>10 A. Yes.</p> <p>11 Q. Sky tell you that directly?</p> <p>12 A. Yeah.</p> <p>13 Q. And what did Sky say the private</p> <p>14 detective said to her?</p> <p>15 MR. CARSON: Objection. Asked and</p> <p>16 answered.</p> <p>17 THE DEPONENT: I already told you</p> <p>18 what she said.</p> <p>19 She said, have you -- I'm calling</p> <p>20 on behalf of -- I'm a private</p> <p>21 investigator. Has Lisa Reynolds</p> <p>22 Barbounis ever harassed you?</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. And that's all she said to you?</p>
<p style="text-align: right;">Page 17</p> <p>1 and, you know, like, there's somebody</p> <p>2 that I barely interact with, so how you</p> <p>3 guys would even know that is one.</p> <p>4 But they've called, say, my</p> <p>5 husband's assistant, Sky, and they said</p> <p>6 to her -- they said to her, we're here --</p> <p>7 I'm a private investigator, has Lisa</p> <p>8 Reynolds Barbounis ever harassed you or</p> <p>9 whatever.</p> <p>10 They called multiple people and</p> <p>11 then it's gotten back to me that they</p> <p>12 were a private investigator and that they</p> <p>13 are investigating me on behalf of Greg</p> <p>14 Roman and the Middle East Forum.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. Have you ever been contacted by a</p> <p>17 private investigator?</p> <p>18 A. I have not been contacted. Isn't</p> <p>19 that the point, they're supposed to do</p> <p>20 behind-the-scene surveillance on me and then just</p> <p>21 reach out to other people?</p> <p>22 Q. So who has told you that they've</p> <p>23 been contacted by a private investigator?</p> <p>24 MR. CARSON: Objection.</p>	<p style="text-align: right;">Page 19</p> <p>1 MR. CARSON: Objection. Asked and</p> <p>2 answered.</p> <p>3 THE DEPONENT: Yeah. Her and I --</p> <p>4 like, we don't really, like, get along.</p> <p>5 So, yeah.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Okay. Did you say anything to</p> <p>8 her?</p> <p>9 A. No. Thanks for letting me know.</p> <p>10 Q. How about Steve, what did he say</p> <p>11 to you?</p> <p>12 A. That was so long ago I don't even</p> <p>13 remember. He said that, like, he does that kind</p> <p>14 of stuff for a living.</p> <p>15 He said, you can tell people are</p> <p>16 following me and stuff. I said, I don't even</p> <p>17 know how you're brought into this. I talked to</p> <p>18 you like three times last year.</p> <p>19 Q. Did he say the private detective</p> <p>20 actually spoke to him?</p> <p>21 A. I believe so.</p> <p>22 Q. Okay. Did he say what the private</p> <p>23 detective said to him?</p> <p>24 MR. CARSON: Objection. Asked and</p>

<p>1 answered.</p> <p>2 THE DEPONENT: Honestly, this was</p> <p>3 like in October.</p> <p>4 There's so many things going on</p> <p>5 with this case, it's just exhausting. I</p> <p>6 don't remember every word that they said,</p> <p>7 but, yeah, it's been brought to my</p> <p>8 attention on numerous occasions.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. Are there any other people that</p> <p>11 you can recall sitting here today that have told</p> <p>12 you they've been contacted by a private</p> <p>13 detective?</p> <p>14 A. There was one other person, but I</p> <p>15 can't remember who it was. I'm trying to think.</p> <p>16 I'm sitting here trying to think.</p> <p>17 Q. Okay.</p> <p>18 A. If I remember, I'll let you know.</p> <p>19 Q. You said earlier that you don't</p> <p>20 get along with Sky.</p> <p>21 A. Yes.</p> <p>22 Q. Why not?</p> <p>23 A. Because -- I have a rule in my --</p> <p>24 in our home that when me and Vasilie were, you</p>	<p>Page 20</p> <p>1 now to all the harassment from Middle</p> <p>2 Eastern Forum from day one?</p> <p>3 MR. CAVALIER: I wasn't finished</p> <p>4 my question.</p> <p>5 MR. CARSON: Okay.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. My question is, are there any</p> <p>8 other instances of what you call harassment in</p> <p>9 your words that you can think of that the Middle</p> <p>10 East Forum engaged enduring this same time</p> <p>11 period?</p> <p>12 MR. CARSON: What time frame are</p> <p>13 we talking about?</p> <p>14 MR. CAVALIER: The time frame that</p> <p>15 she says that people were telling her</p> <p>16 they were contacted by a private</p> <p>17 detective.</p> <p>18 MR. CARSON: She didn't identify a</p> <p>19 time frame, so I think we need to</p> <p>20 identify a time frame.</p> <p>21 MR. CAVALIER: I asked her. She</p> <p>22 said this was like October.</p> <p>23 MR. CARSON: So your question --</p> <p>24 in October of 2021 -- or I'm sorry,</p>
<p>Page 21</p> <p>1 know, on our break or whatever we were doing,</p> <p>2 that you don't bring other people that you're</p> <p>3 seeing around your children.</p> <p>4 And so I let her know that and she</p> <p>5 violated that and he did, too. But now that</p> <p>6 has -- we're all under a mutual agreement. Plus,</p> <p>7 I don't even think he's dating her -- I know he's</p> <p>8 not dating her anymore.</p> <p>9 But she's still his assistant. So</p> <p>10 I just don't want somebody who my husband had a</p> <p>11 relationship around my kids. I wouldn't do that</p> <p>12 to him, so -- or my kids.</p> <p>13 I wouldn't put them in that</p> <p>14 position, so...</p> <p>15 Q. Okay. Are there any other things</p> <p>16 that you can consider harassment by the Forum</p> <p>17 that have occurred?</p> <p>18 MR. CARSON: Objection. Calls for</p> <p>19 a legal conclusion. Answering that</p> <p>20 question would take her about six hours.</p> <p>21 Do you want her to go through it</p> <p>22 all from beginning to end?</p> <p>23 Is that your question?</p> <p>24 Do you want her to justify right</p>	<p>Page 22</p> <p>1 strike that.</p> <p>2 In October of 2020 -- was there --</p> <p>3 is the question in October of 2020 are</p> <p>4 there any other examples of harassment by</p> <p>5 the Middle East Forum? Is that your</p> <p>6 question?</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. No.</p> <p>9 The question is, in or about this</p> <p>10 same time frame that you referenced, that you</p> <p>11 said people were contacting you, saying that they</p> <p>12 were contacted by a private detective of the</p> <p>13 Middle East Forum, are there any other examples</p> <p>14 of the harassments that you mentioned that</p> <p>15 occurred?</p> <p>16 A. You mean the private investigator?</p> <p>17 MR. CARSON: I'm going to object.</p> <p>18 It calls for a legal conclusion. The</p> <p>19 word harassment is a legal concept.</p> <p>20 To the extent that she understands</p> <p>21 the question, understands what you mean,</p> <p>22 she can answer.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. For the record, I'm using the</p>



<p>1 witness' words.</p> <p>2 MR. CARSON: The word has a legal</p> <p>3 connotation, what is and what isn't</p> <p>4 harassment is defined by courts.</p> <p>5 But to the extent she understands</p> <p>6 the question, she can certainly answer to</p> <p>7 what she feels is harassment in or around</p> <p>8 October of 2020.</p> <p>9 THE DEPONENT: As far as the</p> <p>10 harassment regarding the private</p> <p>11 investigator, I don't remember any more</p> <p>12 of that.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Okay. Since you filed your</p> <p>15 amended complaint, can you name any other</p> <p>16 instances of harassment that you claim the Middle</p> <p>17 East Forum has engaged in?</p> <p>18 A. Yes.</p> <p>19 MR. CARSON: Objection. Same</p> <p>20 objection as before.</p> <p>21 You can answer.</p> <p>22 THE DEPONENT: There's plenty,</p> <p>23 but, yes, they -- Daniel Pipes, when he</p> <p>24 asked me to meet with him at 30th Street</p>	<p>Page 24</p> <p>1 A. He laughed. He said, I can't</p> <p>2 believe they're going this far. This is crazy.</p> <p>3 Q. Did you discuss any of the</p> <p>4 contents of the lawsuit with Grayson Levy?</p> <p>5 A. No. He just said, go read it and</p> <p>6 he sent me the link, I believe. But I haven't</p> <p>7 read it because I don't have time.</p> <p>8 Q. You said you haven't been served</p> <p>9 with that lawsuit yet?</p> <p>10 A. Correct. I have not.</p> <p>11 Q. Is it correct then that you don't</p> <p>12 have counsel representing --</p> <p>13 A. I do not have counsel for that</p> <p>14 because I have not been served.</p> <p>15 Q. Okay. What's your reaction to</p> <p>16 that?</p> <p>17 MR. CARSON: Objection. Object to</p> <p>18 form.</p> <p>19 What do you mean by what's her</p> <p>20 reaction? What does that even mean?</p> <p>21 MR. CAVALIER: You can answer.</p> <p>22 MR. CARSON: You can answer, if</p> <p>23 you know.</p> <p>24 THE DEPONENT: I'm going to ask</p>
<p>Page 25</p> <p>1 Station told me that if I didn't drop my</p> <p>2 claims, that he was going to file a RICO</p> <p>3 case against me.</p> <p>4 It is my understanding that it has</p> <p>5 been filed because an employee -- or a</p> <p>6 contractor of MEF told -- was the one</p> <p>7 that brought it to my attention.</p> <p>8 So not my lawyer. I haven't been</p> <p>9 served. But other people have been</p> <p>10 coming to me saying, the Middle East</p> <p>11 Forum filed a RICO case on you.</p> <p>12 I think that was, like, last week.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Who told you about that?</p> <p>15 A. Grayson Levy.</p> <p>16 Q. Do you know how he found out about</p> <p>17 that?</p> <p>18 A. That it was on the court docket or</p> <p>19 something.</p> <p>20 Q. Okay. Did you have a conversation</p> <p>21 about the RICO lawsuit?</p> <p>22 A. I just said they're just</p> <p>23 unbelievable.</p> <p>24 Q. What did he say about the lawsuit?</p>	<p>Page 27</p> <p>1 you a follow-up question. Was -- do you</p> <p>2 want to know how that makes me feel? Is</p> <p>3 that what you want to know?</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. I want to know what your reaction</p> <p>6 was to Grayson Levy calling you and telling you</p> <p>7 that Middle East Forum had filed a RICO lawsuit?</p> <p>8 MR. CARSON: Objection. She</p> <p>9 already testified to what her and Grayson</p> <p>10 Levy said.</p> <p>11 THE DEPONENT: I thought you were</p> <p>12 done, Seth.</p> <p>13 MR. CARSON: Yes. I'm basically</p> <p>14 done. If you understand the question,</p> <p>15 you can answer.</p> <p>16 THE DEPONENT: Sorry. The</p> <p>17 question was how -- what was my reaction,</p> <p>18 is that what the question was?</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. What was your reaction to Grayson</p> <p>21 Levy calling you and telling you that the Middle</p> <p>22 East Forum filed a RICO lawsuit?</p> <p>23 A. I thought, more of the same. Here</p> <p>24 we go. Just more crap from them.</p>

<p>Page 28</p> <p>1 Just another thing to pile on top 2 of my plate. They're trying to break me. That's 3 what I thought.</p> <p>4 Q. Does it concern you at all?</p> <p>5 MR. CARSON: Objection. Object to 6 form. Go ahead. You can answer.</p> <p>7 THE DEPONENT: Of course. Because 8 it damages my reputation. Anytime I have 9 to go -- like if I need to find another 10 job or I'm gonna go speak on a panel, 11 anybody that Googles me sees all these 12 ridiculous claims about me.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Well, if you haven't read it, how 15 do you know they're ridiculous claims?</p> <p>16 MR. CARSON: Objection.</p> <p>17 THE DEPONENT: Because I have 18 never done anything, misappropriated any 19 funds, got any money from anywhere extra, 20 anywhere, and have never partake in 21 conspiratorial things.</p> <p>22 I know what a RICO lawsuit is, a 23 civil one.</p> <p>24 It's criminal racketeering. I</p>	<p>Page 30</p> <p>1 acts.</p> <p>2 So everything she just said is 3 entirely accurate. And your question 4 demonstrates a misunderstanding of what a 5 civil RICO case is.</p> <p>6 But to the extent that it calls 7 for a legal conclusion, you can answer 8 the question.</p> <p>9 THE DEPONENT: I am not concerned 10 about winning that case. I believe that 11 I would.</p> <p>12 I am concerned that it's in the 13 public sphere and a tarnish to my name.</p> <p>14 And even if the case -- even if we 15 do win it, you Google it, that's what 16 will come up when you do my name.</p> <p>17 So that is forever on the 18 internet. Forever. Even if I win, 19 they're gonna say, oh, she was involved 20 in that.</p> <p>21 There's always gonna be 22 speculation around that no matter what 23 happens.</p> <p>24 And I think that that is</p>
<p>Page 29</p> <p>1 mean, I'm a mother of two, who's never 2 gotten in trouble in her entire life.</p> <p>3 No, I'm not a criminal 4 conspiratorial person.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. I'm sorry. I didn't mean to 7 interrupt you.</p> <p>8 A. No, I just -- I know that I've 9 never done anything wrong or illegal.</p> <p>10 MR. CARSON: Are these even -- is 11 this why we're here today?</p> <p>12 I mean, if you're gonna waste your 13 time on this, feel free.</p> <p>14 You guys have seven hours. If 15 this is how you want to spend it, please 16 proceed.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Do you understand that a civil 19 complaint filed against you is not the same as a 20 criminal charge, correct?</p> <p>21 MR. CARSON: Objection. Calls for 22 a legal conclusion.</p> <p>23 A civil RICO case action does 24 include criminal -- requires criminal</p>	<p>Page 31</p> <p>1 disgusting. And I will -- and I will win 2 that case, but it's gonna harm me for the 3 rest of my life.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Just to be clear for the record, 6 and I don't mean to ask this in a flippant way.</p> <p>7 But you're confident that you're 8 going to win a case that you haven't been served 9 with or read?</p> <p>10 MR. CARSON: Objection.</p> <p>11 Objection. You don't have to answer 12 that.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. That's your testimony?</p> <p>15 MR. CARSON: Lisa, I'm directing 16 her not to answer that question. It's 17 designed to embarrass and harass her.</p> <p>18 It's a ridiculous question --</p> <p>19 MR. CAVALIER: I'm trying to find 20 out why she knows so much about the 21 lawsuit if she says she had a 30-second 22 conversation --</p> <p>23 MR. CARSON: Lisa, Lisa, there's 24 no question pending. And she doesn't</p>

<p>Page 32</p> <p>1 have to answer the last question.</p> <p>2 Please continue with the next</p> <p>3 question.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Have you talked with anyone else</p> <p>6 about this lawsuit?</p> <p>7 MR. CARSON: Objection. Calls for</p> <p>8 attorney/client privilege. You don't</p> <p>9 have to answer.</p> <p>10 THE DEPONENT: Only my mother,</p> <p>11 that they filed a new one. That's it.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. I don't want to know anything</p> <p>14 about the substance of your conversation.</p> <p>15 Have you talked to Seth about that</p> <p>16 lawsuit?</p> <p>17 MR. CARSON: Object. Objection.</p> <p>18 She's not going to answer that question.</p> <p>19 What are you asking her right now?</p> <p>20 MR. CAVALIER: I'm asking her</p> <p>21 whether she's ever spoken to an attorney</p> <p>22 about the lawsuit.</p> <p>23 MR. CARSON: Objection. She just</p> <p>24 absolutely, positively does not have to</p>	<p>Page 34</p> <p>1 attorney about.</p> <p>2 MR. CAVALIER: I specifically said</p> <p>3 I'm not asking her what she talked about.</p> <p>4 MR. CARSON: The question is, did</p> <p>5 you talk to her about the RICO case.</p> <p>6 That is asking her what the conversation</p> <p>7 was about.</p> <p>8 She's not gonna answer that</p> <p>9 question.</p> <p>10 MR. CAVALIER: That's absolutely</p> <p>11 not true.</p> <p>12 MR. CARSON: Okay. She is not</p> <p>13 answering. I'm instructing her not to</p> <p>14 answer.</p> <p>15 MR. CAVALIER: All right. We'll</p> <p>16 come back to that.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Who else have you talked to about</p> <p>19 the RICO lawsuit?</p> <p>20 MR. CARSON: Objection to the</p> <p>21 extent it calls for her to answer,</p> <p>22 whether or not she had a conversation</p> <p>23 with an attorney, I'm directing her not</p> <p>24 to answer.</p>
<p>Page 33</p> <p>1 answer that question based on</p> <p>2 attorney/client privilege.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. I'll ask the question again.</p> <p>5 I don't want to know what you</p> <p>6 talked about. I don't want to know any details</p> <p>7 about of the conversation.</p> <p>8 The question is simply, have you</p> <p>9 spoken to an attorney about that?</p> <p>10 MR. CARSON: Objection. Do not</p> <p>11 answer the question.</p> <p>12 MR. CAVALIER: That's an improper</p> <p>13 instruction.</p> <p>14 MR. CARSON: Well, I'm instructing</p> <p>15 her not to answer the question. You want</p> <p>16 to call Judge Wilson and have a ruling,</p> <p>17 we can do it.</p> <p>18 MR. CAVALIER: We're gonna get</p> <p>19 close to that today.</p> <p>20 MR. CARSON: That's fine. Well,</p> <p>21 let's do it now, if you want.</p> <p>22 You can tell Judge Wilson you're</p> <p>23 asking her whether she talked to an</p> <p>24 attorney and what she talked to the</p>	<p>Page 35</p> <p>1 If she talked to any other</p> <p>2 non-attorneys about the lawsuit, she can</p> <p>3 answer that.</p> <p>4 THE DEPONENT: I just told my</p> <p>5 mother and she said, don't worry about</p> <p>6 it, the truth is on your side. And I</p> <p>7 said okay. But I still worry about it.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. And you worry about it because, as</p> <p>10 you said before, it's on the public record,</p> <p>11 correct?</p> <p>12 MR. CARSON: Objection. Asked and</p> <p>13 answered. You can answer again.</p> <p>14 THE DEPONENT: Yes.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. Because having a lawsuit filed</p> <p>17 against you that contains things that you believe</p> <p>18 are not true can be harmful to you, correct?</p> <p>19 MR. CARSON: Objection. Asked and</p> <p>20 answered. You can answer.</p> <p>21 THE DEPONENT: Yes.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. Like, for example, if someone were</p> <p>24 to file a lawsuit falsely claiming that they were</p>

<p>Page 36</p> <p>1 sexually assaulted by someone, that could harm 2 that person's reputation?</p> <p>3 MR. CARSON: Objection. I'm 4 instructing her not to answer the 5 question. That's designed to embarrass 6 and harass.</p> <p>7 Don't answer.</p> <p>8 MR. CAVALIER: Explain how that's 9 intended to embarrass and harass.</p> <p>10 MR. CARSON: You're suggesting 11 that her -- that a lawsuit she filed in 12 which is supported by how many witnesses, 13 is somehow predicated on things that 14 didn't happen.</p> <p>15 My client was sexually assaulted 16 twice by your client. And your question 17 indicates that she made that up.</p> <p>18 It's designed to embarrass her. 19 It's designed to harass her. It's 20 designed to belittle her. It's designed 21 to subject her to further verbal abuse.</p> <p>22 And I'm not going to allow her to 23 answer that question.</p> <p>24 MR. CAVALIER: Having now heard</p>	<p>Page 38</p> <p>1 named as the person who committed the 2 sexual assault, if you're asking that 3 hypothetical, where the person made 4 everything up, if that would cause the 5 person harm, she can answer that yes or 6 no.</p> <p>7 MR. CAVALIER: That's exactly what 8 I'm asking.</p> <p>9 MR. CARSON: Good question, John. 10 You can answer it, Lisa, yes or 11 no.</p> <p>12 THE DEPONENT: I take anything 13 that is filed publicly to -- I think 14 there's a responsibility for whoever 15 files a lawsuit to be honest and truthful 16 at all times.</p> <p>17 And I think that people who make 18 false accusations are terrible people.</p> <p>19 BY MR. CAVALIER: 20 Q. And a person -- a terrible person, 21 to use your words, making those false allegations 22 would do great harm to the subject of those false 23 allegations, correct?</p> <p>24 MR. CARSON: Objection.</p>
<p>Page 37</p> <p>1 your attorney's speech, I'll let you know 2 and I'll represent that I'm not even 3 talking about your lawsuit that you --</p> <p>4 MR. CARSON: Yeah, you are.</p> <p>5 MR. CAVALIER: No, I'm not.</p> <p>6 MR. CARSON: So generally -- so 7 ask the question again and I'll listen to 8 it and respond.</p> <p>9 BY MR. CAVALIER: 10 Q. This question is based on what you 11 just told me about the harm that it could bring 12 to you being accused in a public lawsuit.</p> <p>13 Isn't it then fair to say, for 14 example, that someone, not you, but someone 15 accusing someone falsely of sexual assault in a 16 public lawsuit could bring harm to that person's 17 reputation?</p> <p>18 MR. CARSON: Objection. 19 Objection.</p> <p>20 If you're asking her if some other 21 person made a false allegation of sexual 22 assault and filed a lawsuit based on that 23 false allegation, if that would cause the 24 person to whom -- to whom the lawsuit</p>	<p>Page 39</p> <p>1 Objection.</p> <p>2 Are we still talking about the 3 hypothetical person who filed -- who made 4 up a sexual assault claim? Is that what 5 we're still talking about?</p> <p>6 MR. CAVALIER: Yes.</p> <p>7 MR. CARSON: So to the extent this 8 is about a hypothetical person who made 9 up sexual assault claim and then filed it 10 online and it never really happened, you 11 can answer that.</p> <p>12 MR. CAVALIER: That is precisely 13 what we are talking about.</p> <p>14 MR. CARSON: John, let's just take 15 a minute and think about what we're doing 16 right now.</p> <p>17 Are you ever going to be able to 18 use any of this in a courtroom?</p> <p>19 Or is this just a complete waste 20 of time right now?</p> <p>21 Why don't we move on and try to 22 get this done. I have other things I can 23 do today.</p> <p>24 I don't need to waste my time with</p>



<p>1 this nonsense.</p> <p>2 MR. GOLD: For the record, this is</p> <p>3 Sid Gold.</p> <p>4 You've got to let John finish the</p> <p>5 question. Let her just answer it.</p> <p>6 Otherwise, we got to call the</p> <p>7 Judge.</p> <p>8 MR. CARSON: That's fine. We can</p> <p>9 call the Judge.</p> <p>10 MR. GOLD: These objections are</p> <p>11 speaking objections. You're arguing with</p> <p>12 counsel.</p> <p>13 Just let her answer the question</p> <p>14 and we'll move on.</p> <p>15 MR. CARSON: No. No. I'm not</p> <p>16 just going to allow her to answer the</p> <p>17 question.</p> <p>18 MR. GOLD: But you're</p> <p>19 just speaking -- you're making speaking</p> <p>20 objections and it's just not --</p> <p>21 MR. CARSON: Mr. Gold, I'm</p> <p>22 pointing out the absurdity of the</p> <p>23 question.</p> <p>24 MR. GOLD: But absurdity is not a</p>	<p>Page 40</p>	<p>1 the seventh time you said it. I think</p> <p>2 seven is enough.</p> <p>3 MR. CARSON: I'm going to say it</p> <p>4 for every question that's asked.</p> <p>5 MR. GOLD: Well, if you do, we'll</p> <p>6 have to go to the Judge.</p> <p>7 MR. CARSON: I would love to.</p> <p>8 MR. GOLD: You would love to.</p> <p>9 Well, you may have your dream come</p> <p>10 true in a few minutes.</p> <p>11 MR. CARSON: Like I just said, I</p> <p>12 think that's a great idea.</p> <p>13 MR. CAVALIER: I'm gonna repeat</p> <p>14 the question.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. With the acknowledgment that I am</p> <p>17 in now way, shape or form speaking about your</p> <p>18 particular claim, the question is, again, having</p> <p>19 now heard that long soliloquy from your counsel,</p> <p>20 if someone, not you, but someone were to include</p> <p>21 in a publicly-filed complaint a false allegation</p> <p>22 of sexual assault, that would do great harm to</p> <p>23 the subject of that allegation, correct?</p> <p>24 MR. CARSON: I'm going to object</p>	<p>Page 42</p>
<p>1 proper objection.</p> <p>2 MR. CARSON: No. But form is.</p> <p>3 And I'm making sure the record is</p> <p>4 clear, but we're not talking about Lisa,</p> <p>5 that we're not talking about anything</p> <p>6 that actually ever happened --</p> <p>7 MR. GOLD: Well, I think you are</p> <p>8 speaking -- I think --</p> <p>9 MR. CARSON: -- in the universe in</p> <p>10 which we live in.</p> <p>11 MR. GOLD: You know what?</p> <p>12 Again, if you can refrain, the</p> <p>13 best you can, that would be helpful.</p> <p>14 Otherwise we're going to be here all day</p> <p>15 again, you know.</p> <p>16 MR. CARSON: Yeah. I mean, like I</p> <p>17 said, you guys want to waste your time</p> <p>18 inventing things that never happened in</p> <p>19 the universe we live in, and if that's</p> <p>20 the deposition you want to take today,</p> <p>21 I'm just going to make sure that the</p> <p>22 record is very clear that that's what</p> <p>23 we're doing.</p> <p>24 MR. GOLD: You've made -- that's</p>	<p>Page 41</p>	<p>1 to the form. This is a hypothetical</p> <p>2 question. It never happened.</p> <p>3 And subject to that objection, you</p> <p>4 can answer his question.</p> <p>5 The question is, would it do great</p> <p>6 harm to the person?</p> <p>7 THE DEPONENT: Hypothetically</p> <p>8 speaking, yes.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. And in that same hypothetical, the</p> <p>11 same would be true for an allegation relating to</p> <p>12 sexual trafficking, correct?</p> <p>13 MR. CARSON: Objection. Calls for</p> <p>14 a legal conclusion.</p> <p>15 To the extent that there was</p> <p>16 sexual trafficking claims ever in this</p> <p>17 case, which were removed pursuant to an</p> <p>18 agreement by the parties, she can answer</p> <p>19 if she knows what those claims are.</p> <p>20 I would suggest that they were</p> <p>21 entirely justified and they could have</p> <p>22 easily stayed in the case.</p> <p>23 But to the extent that she</p> <p>24 understands what the sexual trafficking</p>	<p>Page 43</p>

<p>Page 44</p> <p>1 laws are, she can answer.</p> <p>2 The hypothetical question that</p> <p>3 never happened in this universe.</p> <p>4 Go ahead, Lisa. We can't hear</p> <p>5 you.</p> <p>6 THE DEPONENT: I can't even</p> <p>7 remember what the question was.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. You know, I can understand that.</p> <p>10 The question is, under the same</p> <p>11 hypothetical, not talking about your lawsuit or</p> <p>12 your claims or anything that you said, just in</p> <p>13 general, if someone were falsely accused in a</p> <p>14 complaint of sexual trafficking, that would do</p> <p>15 great harm to that person, correct?</p> <p>16 MR. CARSON: I'm going to object</p> <p>17 based on the fact that it calls for a</p> <p>18 legal conclusion.</p> <p>19 MR. CAVALIER: You've already</p> <p>20 stated your objection.</p> <p>21 THE DEPONENT: Forget it, guys.</p> <p>22 MR. CARSON: The sexual</p> <p>23 trafficking laws are-- require a legal</p> <p>24 analysis with elements.</p>	<p>Page 46</p> <p>1 You don't have to answer that</p> <p>2 question.</p> <p>3 MR. CAVALIER: All right. I'll</p> <p>4 withdraw the question. Let's look at the</p> <p>5 order.</p> <p>6 MR. CARSON: I mean, this is how</p> <p>7 you want to spend the next 20 minutes?</p> <p>8 We're about to go off the record</p> <p>9 guys. It's almost 11, just to keep an</p> <p>10 eye on the clock.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Can you see that document?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Have you seen this document</p> <p>15 before?</p> <p>16 A. Huh-uh. No.</p> <p>17 Q. Do you see where it says the Court</p> <p>18 issued valid orders in this case, including ECF</p> <p>19 Number 6974?</p> <p>20 MR. CARSON: Objection. You just</p> <p>21 want to take a minute and just have her</p> <p>22 read the whole thing?</p> <p>23 MR. CAVALIER: Sure. She can read</p> <p>24 the whole thing.</p>
<p>Page 45</p> <p>1 To the extent she understands what</p> <p>2 those are and to the extent that it's a</p> <p>3 hypothetical, she can answer the</p> <p>4 question.</p> <p>5 THE DEPONENT: Okay. So --</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Just answer the question.</p> <p>8 A. A, it would depend on the context.</p> <p>9 It would depend on the context.</p> <p>10 But if there -- everything aside,</p> <p>11 in this hypothetical world of yours, everything</p> <p>12 aside, and somebody just did an international</p> <p>13 lawsuit, whatever, sure.</p> <p>14 Q. And by the way, since your counsel</p> <p>15 decided to give multiple speeches there asking</p> <p>16 whether we're going to be here all day and</p> <p>17 whether he -- you know, I think he said he had</p> <p>18 better things to do.</p> <p>19 You realize that we're only here</p> <p>20 today because you and your counsel violated court</p> <p>21 orders, correct?</p> <p>22 MR. CARSON: Objection. The</p> <p>23 question's designed to embarrass and</p> <p>24 harass her.</p>	<p>Page 47</p> <p>1 MR. CARSON: Lisa, why don't you</p> <p>2 just take a minute and read the whole</p> <p>3 thing.</p> <p>4 THE DEPONENT: Can I take a break</p> <p>5 and read it? Or do I have to read it,</p> <p>6 like, right now?</p> <p>7 MR. CARSON: No, read it on the</p> <p>8 record.</p> <p>9 THE DEPONENT: It's hard to read</p> <p>10 on the tiny screen here.</p> <p>11 Okay. I read it. I read it.</p> <p>12 Sorry.</p> <p>13 MR. CARSON: It's five pages.</p> <p>14 Just read the whole thing.</p> <p>15 THE DEPONENT: You just went too</p> <p>16 far --</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. I don't want you to -- you can</p> <p>19 read the whole thing --</p> <p>20 MR. CARSON: No. No. If she is</p> <p>21 going to answer a question about the</p> <p>22 document, I want her to read it all.</p> <p>23 MR. CAVALIER: All right. Fair</p> <p>24 enough.</p>



<p>Page 48</p> <p>1 THE DEPONENT: I would like to</p> <p>2 know what it says -- I mean, now that I'm</p> <p>3 here, I guess.</p> <p>4 MR. CAVALIER: Go ahead.</p> <p>5 THE DEPONENT: I read quickly, so</p> <p>6 we'll be okay.</p> <p>7 MR. CAVALIER: I know you do.</p> <p>8 Take your time -- as much time as you</p> <p>9 need.</p> <p>10 Let me know when you want me to</p> <p>11 scroll. Or the court reporter or the</p> <p>12 video tech can give me control of the</p> <p>13 document.</p> <p>14 THE DEPONENT: It's fine. I'll be</p> <p>15 quick. I'll just tell you next. Okay.</p> <p>16 Hold on.</p> <p>17 Okay. You can scroll up.</p> <p>18 MR. CARSON: I think you went past</p> <p>19 the top.</p> <p>20 THE DEPONENT: I got it. Okay.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. So the question is then -- do you</p> <p>23 see this line here?</p> <p>24 Actually just read paragraph six.</p>	<p>Page 50</p> <p>1 Secondly, as long as you</p> <p>2 understand why we're here, we can be done with</p> <p>3 this document.</p> <p>4 A. Yeah. I mean, I understand why</p> <p>5 you guys have made it that we are here. But I</p> <p>6 don't think that the reason is justified.</p> <p>7 But that's not for me to decide.</p> <p>8 MR. CAVALIER: Okay. Seth, this</p> <p>9 is a natural break point, if you want to</p> <p>10 take your 11:00?</p> <p>11 MR. CARSON: It's 10:50. We can</p> <p>12 go for another five minutes, if you want.</p> <p>13 It's up to you.</p> <p>14 THE DEPONENT: Unless you need</p> <p>15 that break because you're not feeling</p> <p>16 well, Mr. Caviler.</p> <p>17 MR. CAVALIER: I mean, I'm never</p> <p>18 feeling well today, but if you want to</p> <p>19 keep going, we'll keep going.</p> <p>20 MR. CARSON: I just -- because I'm</p> <p>21 probably going to be -- unless you want</p> <p>22 it to be, like, a 20-minute break, I'm</p> <p>23 cool to keep going for another --</p> <p>24 THE DEPONENT: Do you have the</p>
<p>Page 49</p> <p>1 That's the question.</p> <p>2 You see here where the Court says</p> <p>3 that defendants shall notify the plaintiff's</p> <p>4 counsel if there's good cause to re-open the</p> <p>5 deposition?</p> <p>6 A. If they believe good cause.</p> <p>7 MR. CARSON: Also, I think -- I'm</p> <p>8 gonna object. Maybe if you're gonna ask</p> <p>9 her questions about this document, you</p> <p>10 should explain how we got here.</p> <p>11 Because we didn't get here because</p> <p>12 the Court found good cause to re-open any</p> <p>13 depositions.</p> <p>14 THE DEPONENT: I remember how we</p> <p>15 got here. I mean, I know -- I didn't --</p> <p>16 never saw this document. But I have an</p> <p>17 idea of what is going on here, because I</p> <p>18 remember from the \$50 per day fine thing,</p> <p>19 so...</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. That was my question.</p> <p>22 My first question is, have you</p> <p>23 ever read this document before today. You said</p> <p>24 no.</p>	<p>Page 51</p> <p>1 Corona Virus?</p> <p>2 MR. CAVALIER: That's fine.</p> <p>3 I hope not.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. So then I'll just -- I'll use this</p> <p>6 time to ask you a couple questions about the</p> <p>7 order in the Sanchez case.</p> <p>8 Do you remember that we were</p> <p>9 talking earlier about the trade secrets case?</p> <p>10 A. Yes.</p> <p>11 Q. And I think we got to the point</p> <p>12 where either you or your counsel acknowledged</p> <p>13 that it was part of your retaliation from this</p> <p>14 lawsuit, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you believe that claim, that</p> <p>17 the trade secret's case is frivolous, I think you</p> <p>18 said?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Have you ever read the</p> <p>21 opinion in -- that Judge Sanchez issued on</p> <p>22 January 11 in the trade secrets case?</p> <p>23 A. No.</p> <p>24 Q. Are you aware that in that</p>

<p>Page 52</p> <p>1 opinion, Judge Sanchez said that there is a 2 reasonable likelihood that the Forum will succeed 3 on the merits of its breach of contract and 4 misappropriation of trade secrets claims against 5 you?</p> <p>6 MR. CARSON: I'm going to object 7 to the question in that it --</p> <p>8 THE DEPONENT: Yeah, I don't even 9 understand --</p> <p>10 MR. CARSON: Lisa, let me finish 11 the objection.</p> <p>12 THE DEPONENT: Oh, sorry. I want 13 to --</p> <p>14 MR. CARSON: I want to object to 15 the form of the question, to the extent 16 that she understands it and to the extent 17 that it calls for a representation of 18 facts that are false.</p> <p>19 But to the extent that you 20 understand the question, you can answer.</p> <p>21 THE DEPONENT: So you were talking 22 about Judge Sanchez's ruling, that it may 23 be or something on the merits, is that 24 what you said?</p>	<p>Page 54</p> <p>1 just wrong.</p> <p>2 MR. CAVALIER: Seth, how -- I'm 3 asking her if she has awareness of 4 something.</p> <p>5 MR. CARSON: All right. Why don't 6 we explain that --</p> <p>7 MR. CAVALIER: If the answer's no, 8 the answer's no.</p> <p>9 MR. CARSON: Why don't you show 10 her the order? Show her the order.</p> <p>11 MR. CAVALIER: All right.</p> <p>12 MR. CARSON: The order speaks for 13 itself, where defendant's motion was 14 denied -- or plaintiff's motion was 15 denied.</p> <p>16 THE DEPONENT: Can I just say 17 something? I just want to finish what I 18 was going to say.</p> <p>19 MR. CAVALIER: Sure.</p> <p>20 MR. CARSON: Well, there's no 21 question pending, Lisa. So wait. Just 22 wait.</p> <p>23 BY MR. CAVALIER: 24 Q. What were you gonna say?</p>
<p>Page 53</p> <p>1 BY MR. CAVALIER: 2 Q. Yeah. I'm asking you whether you 3 are aware of the fact that Judge Sanchez held 4 that the Forum had established a reasonable 5 likelihood of success on the merits of its claims 6 against you in the trade secrets?</p> <p>7 MR. CARSON: I'm going to object 8 one more time.</p> <p>9 Mr. Caviler, we didn't even argue 10 that point.</p> <p>11 We won the motion based the 12 irreparable harm argument. That's the 13 only argument we made.</p> <p>14 So you're asking her questions 15 about an argument that -- we just 16 conceded, because we knew we could win on 17 irreparable harm.</p> <p>18 So to the extent that she 19 understands the question, she can answer.</p> <p>20 MR. CAVALIER: Seth, I'm going to 21 ask you to stop with the speeches, 22 because we are going to be here all day.</p> <p>23 MR. CARSON: You're trying to 24 trick her into saying things that are</p>	<p>Page 55</p> <p>1 MR. CARSON: No. No. No. Wait. 2 wait for the question.</p> <p>3 THE DEPONENT: I want you to 4 repeat back what the question was.</p> <p>5 MR. CARSON: Yes. Thank you.</p> <p>6 BY MR. CAVALIER: 7 Q. The question is, are you aware of 8 the fact that Judge Sanchez issued an order in 9 which he determined that the Middle East Forum 10 established a reasonable likelihood of success on 11 its trade secrets claim?</p> <p>12 A. Reasonable and likelihood --</p> <p>13 MR. CARSON: Lisa, wait. 14 You've got to wait for the 15 objections.</p> <p>16 THE DEPONENT: You already 17 objected to this --</p> <p>18 THE REPORTER: Excuse me.</p> <p>19 THE DEPONENT: I'm taking a break. 20 I'm taking a break.</p> <p>21 MR. CAVALIER: You're blaming me 22 for this, Seth?</p> <p>23 MR. CARSON: No, I'm not. But I 24 guess we're going to go off the record.</p>

<p>1 I'll take my call.</p> <p>2 MR. CAVALIER: How long do we</p> <p>3 need?</p> <p>4 MR. CARSON: Probably about until</p> <p>5 11:10.</p> <p>6 MR. CAVALIER: All right. We'll</p> <p>7 go back on at 11:10.</p> <p>8 THE VIDEOGRAPHER: The time is</p> <p>9 10:54 a.m.</p> <p>10 We are off the record.</p> <p>11 (Recess taken.)</p> <p>12 THE VIDEOGRAPHER: The time is</p> <p>13 11:20 a.m.</p> <p>14 We are back on the record.</p> <p>15 MR. CAVALIER: Before I start, I'm</p> <p>16 gonna pick up on what you just said there</p> <p>17 and I think it's only fair to caution you</p> <p>18 that you need to control your speaking</p> <p>19 objections.</p> <p>20 You need to give the witness a</p> <p>21 chance to answer the questions. And more</p> <p>22 importantly, you need to give me a chance</p> <p>23 to get my questions out.</p> <p>24 MR. CARSON: If I'm not giving you</p>	<p>Page 56</p> <p>1 MR. CAVALIER: Well, I will ask</p> <p>2 you, in accordance with the rules, to</p> <p>3 simply state your objection concisely and</p> <p>4 to allow the witness to answer the</p> <p>5 question, unless you're instructing her</p> <p>6 otherwise.</p> <p>7 MR. CARSON: I would suggest that</p> <p>8 there's -- this doesn't even need to be a</p> <p>9 seven-hour deposition, since you've</p> <p>10 already done about eight-and-a-half hours</p> <p>11 with her.</p> <p>12 You've also done, I think, another</p> <p>13 seven hours with her.</p> <p>14 I think she's probably testified</p> <p>15 in all -- to everything you've asked</p> <p>16 today, I think she probably already</p> <p>17 testify about. And that you're just</p> <p>18 going through the same stuff again, which</p> <p>19 is not the reason why Judge Wilson</p> <p>20 ordered that depositions should be</p> <p>21 opened.</p> <p>22 And so if you guys want to get</p> <p>23 down to business and ask questions</p> <p>24 related to why we're actually here today</p>
<p>Page 57</p> <p>1 an opportunity to finish your question, I</p> <p>2 will definitely keep that in mind. I'm</p> <p>3 not trying to cut you off at all.</p> <p>4 I'm gonna put the objections on</p> <p>5 the record that I think are appropriate.</p> <p>6 And then after that, my client will</p> <p>7 answer, unless I instruct her not to.</p> <p>8 MR. CAVALIER: I appreciate that</p> <p>9 but at the same time, I think you spoke</p> <p>10 to me or the witness during the first</p> <p>11 hour of this deposition.</p> <p>12 And I'm just letting you know that</p> <p>13 we're not going to tolerate the speaking</p> <p>14 objections all day.</p> <p>15 MR. CARSON: Maybe you should</p> <p>16 consider the questions that are being</p> <p>17 asked in the first hour then.</p> <p>18 MR. CAVALIER: It doesn't matter</p> <p>19 how bad my questions are. Speaking</p> <p>20 objections are improper regardless.</p> <p>21 MR. CARSON: It does matter,</p> <p>22 though.</p> <p>23 It matters a lot what the</p> <p>24 questions are, so...</p>	<p>Page 58</p> <p>1 and not about MEF's cinematics' universe</p> <p>2 and hypothetical situations that never</p> <p>3 happened, then we can probably get</p> <p>4 wrapped up pretty quickly.</p> <p>5 MR. CAVALIER: Well, it's my</p> <p>6 deposition. So I'll take it where I want</p> <p>7 to go.</p> <p>8 Secondly, the reason it's taking</p> <p>9 so long is because of the speaking</p> <p>10 objections that you're giving.</p> <p>11 And third, we covered two major</p> <p>12 topics during the first hour. One of</p> <p>13 which was a December 4th order. One of</p> <p>14 which was a January 11th order.</p> <p>15 Neither of which were in existence</p> <p>16 the last time we sat down for this</p> <p>17 deposition.</p> <p>18 So I disagree with your</p> <p>19 characterization of the questions and the</p> <p>20 time frame.</p> <p>21 But regardless, it's my</p> <p>22 prerogative, I'll take the deposition</p> <p>23 where I want to go.</p> <p>24 I was just letting you know that</p>

<p>Page 60</p> <p>1 we're not going to do the speaking 2 objections for the remainder of our time 3 here. 4 And hopefully, if we don't, we can 5 make the court reporter's life easier and 6 we can move this along. 7 MR. CARSON: I absolutely do not 8 know what you mean by it's my deposition. 9 This is not a deposition that 10 belongs to you. It is not your 11 deposition. It's Lisa Barbounis' 12 deposition and I am her counsel. 13 So, first, I don't agree that it's 14 your deposition. 15 And second, one of the orders that 16 you asked questions about isn't even an 17 order that was -- is in this case. 18 So, you know, I think that if you 19 want to ask questions about the reason 20 why we're here today, then we can get 21 through this quicker. 22 So with that in mind, I would ask 23 you to proceed. 24 MR. CAVALIER: Well, it's in this</p>	<p>Page 62</p> <p>1 file that lawsuit. 2 Q. So he told you that this lawsuit 3 was going to be filed, correct? 4 A. Oh, yeah. Yeah. 5 Well, he threatened me with it. 6 Q. Well, he told you it was going to 7 be filed? 8 A. No, he said -- he said, if you 9 drop your cases, I'll scuttle it. I will not -- 10 that was his word, scuttle. Because, you know, I 11 don't use that word. 12 He said he would scuttle the case 13 if I dropped mine. He said, however, if not, 14 we're gonna keep coming and we're gonna drop more 15 cases on you. 16 Q. Okay. Did you record that meeting 17 with Daniel Pipes? 18 A. Nope. He had my phone as a matter 19 of fact. I turned my phone off in front of him. 20 And I will tell you this, the 21 agreement was, he asked me to -- that we meet in 22 a secret place, that nobody else would be there 23 and that -- that both our phones would be turned 24 off.</p>
<p>Page 61</p> <p>1 case because your client put it in this 2 case. 3 BY MR. CAVALIER: 4 Q. But, regardless, Ms. Barbounis, 5 were you surprised to hear that you had been sued 6 under RICO by the Forum? 7 A. Yes. I mean, yes and no. Yes, 8 because I really didn't -- I know, like, I never 9 did anything to constitute that. 10 But, no, because they are always, 11 you know, trying to push on and Daniel Pipes made 12 it clear in our meeting -- yeah, they're always 13 trying to, like, keep putting pressure on me to 14 get rid of this case. 15 And Daniel Pipes made that clear 16 in my meeting with him at 30th Street Station. 17 He said, you know, -- what did he 18 say? 19 He said that he was gonna put this 20 case on me and that this could all go away. And 21 that I'm a nice person. But, like, it's out of 22 principle and out of this and his reputation. 23 And they are gonna -- if I don't 24 drop the cases, that he is going to -- going to</p>	<p>Page 63</p> <p>1 I turned my phone off and handed 2 it to him in front of him. And he couldn't get 3 his phone to magically turn off. 4 So I don't know what he did. But 5 I certainly did not record that meeting, because 6 it would, A, be a violation of law and I don't 7 break laws. 8 Q. But you do record people? 9 A. I have recorded people, yes. 10 Q. Without their consent? 11 A. In the states where it's legal to 12 do that, yes, sir. 13 Q. And without their knowledge? 14 A. Correct, where it's legal to do 15 so. 16 Q. Did you ever record Marnie Meyer 17 without her knowledge? 18 A. Yes. But I made her aware after 19 the fact. 20 Q. After the fact? 21 A. Correct. 22 Q. Where -- 23 A. That was at the direction of 24 Matthew Bennett anyway.</p>



<p>Page 64</p> <p>1 Q. Where were you when you recorded</p> <p>2 Marnie Meyer?</p> <p>3 A. At work.</p> <p>4 Q. In Pennsylvania?</p> <p>5 A. Correct.</p> <p>6 Q. And how did you record Marnie</p> <p>7 Meyer?</p> <p>8 A. We were in the office and she was</p> <p>9 on a speaker phone.</p> <p>10 Q. How long after you recorded her</p> <p>11 did you let her know that you had made the</p> <p>12 recording?</p> <p>13 A. Not very long after, I don't</p> <p>14 believe. I don't remember. But I did -- we</p> <p>15 talked about it. Probably right when we made up.</p> <p>16 That's how me and Marnie were. We had that</p> <p>17 love/hate relationship.</p> <p>18 Q. But before you made up, you had</p> <p>19 recorded her without her knowledge or consent,</p> <p>20 correct?</p> <p>21 A. Uh-huh. Yes. I'm sorry. The</p> <p>22 court reporter needs a yes. Yes.</p> <p>23 Q. Did you ever record any other MEF</p> <p>24 employees without their knowledge or consent?</p>	<p>Page 66</p> <p>1 faith and confidence in him and so what</p> <p>2 we discuss is not -- I have a very busy</p> <p>3 lifestyle. Two little kids. I work many</p> <p>4 hours.</p> <p>5 And honestly, since the</p> <p>6 beginning -- since -- especially since</p> <p>7 this order, but we've had a crazy work</p> <p>8 situation with the insurrection of the</p> <p>9 Capitol and Officer Sitnick dying, who I</p> <p>10 knew.</p> <p>11 And like it's been a very -- very</p> <p>12 complicated and busy time, especially now</p> <p>13 with the impeachment trial beginning.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Are you involved in the</p> <p>16 impeachment trial at all?</p> <p>17 A. No. But my boss, I have to make</p> <p>18 statements and follow it and pay attention.</p> <p>19 And there's constituents calling</p> <p>20 all the time that need a response.</p> <p>21 Q. Okay. We'll talk a little bit</p> <p>22 about that later.</p> <p>23 Just to be clear here, I want to</p> <p>24 show you this sentence.</p>
<p>Page 65</p> <p>1 A. Not without their knowledge or</p> <p>2 consent, no.</p> <p>3 Q. I want to talk to you about the</p> <p>4 Sanchez order that we were talking about before</p> <p>5 the break.</p> <p>6 Can you see that document?</p> <p>7 A. Yes.</p> <p>8 Q. Have you ever seen that document</p> <p>9 before?</p> <p>10 A. You showed it to me right before</p> <p>11 the break.</p> <p>12 Q. Before today?</p> <p>13 A. No. I knew it existed.</p> <p>14 Q. What do you mean you knew it</p> <p>15 existed?</p> <p>16 A. My lawyer told me that Judge</p> <p>17 Sanchez ruled on the hearing that I testified in.</p> <p>18 Q. Okay. But you never -- you</p> <p>19 decided that you didn't find it necessary to</p> <p>20 review the order?</p> <p>21 MR. CARSON: Objection.</p> <p>22 Argumentative.</p> <p>23 THE DEPONENT: My lawyer and I</p> <p>24 speak routinely and so -- and I have full</p>	<p>Page 67</p> <p>1 And to the extent you want to read</p> <p>2 all or part of this order, just let me know and</p> <p>3 you're welcome to do that.</p> <p>4 MR. CARSON: Yeah, I would direct</p> <p>5 her to just take your time and just go</p> <p>6 through the entire order before you</p> <p>7 answer any questions and not read the one</p> <p>8 sentence that was highlighted for you.</p> <p>9 THE DEPONENT: I read pretty</p> <p>10 quickly. I can get through this.</p> <p>11 MR. CAVALIER: I was trying to</p> <p>12 give your counsel the benefit of the</p> <p>13 doubt here by highlighting the sentence</p> <p>14 that he gave a nice long speaking</p> <p>15 objection about earlier that says that</p> <p>16 the Middle East Forum's motion was</p> <p>17 denied.</p> <p>18 But if you want to read more than</p> <p>19 that, you're welcome to.</p> <p>20 MR. CARSON: Again, I'll recommend</p> <p>21 that you just review the document.</p> <p>22 THE DEPONENT: I'm just going to</p> <p>23 review it. Thank you. If everybody will</p> <p>24 just give me a minute.</p>

<p style="text-align: right;">Page 68</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Let me know when you want to</p> <p>3 scroll.</p> <p>4 A. Thank you, sir.</p> <p>5 Okay. I'm good.</p> <p>6 How long is this document, just</p> <p>7 out of curiosity?</p> <p>8 Q. Thirteen pages long -- it's not</p> <p>9 quite 13 pages. I think it's 11 pages long with</p> <p>10 actual text on it.</p> <p>11 A. Okay. Yeah, I know all this. You</p> <p>12 can just keep scrolling. Okay. I'm -- go ahead.</p> <p>13 You can scroll up, please. Okay.</p> <p>14 Keep going, sir.</p> <p>15 Q. I'd ask you to pay special</p> <p>16 attention to this section, because this is what</p> <p>17 we're going to be talking about.</p> <p>18 A. I understand. I can figure out</p> <p>19 what the important parts are.</p> <p>20 You can go ahead, sir.</p> <p>21 Okay. Keep going. Okay.</p> <p>22 Oh, wait. Can you scroll up just</p> <p>23 one moment, please?</p> <p>24 Okay. Keep going, please.</p>	<p style="text-align: right;">Page 70</p> <p>You can answer.</p> <p>THE DEPONENT: Okay. My -- my --</p> <p>my understanding of this document is that</p> <p>a preliminary injunction would be so that</p> <p>you could take everything off, like</p> <p>delete everything from my phone that,</p> <p>like, came up in your search match, which</p> <p>also included random things, like</p> <p>pictures of my family and things like</p> <p>that, and other things that I use for</p> <p>work.</p> <p>But that, you know, there wasn't</p> <p>shown to be immediate harm. Like, it</p> <p>wasn't me having these things on my phone</p> <p>would not -- or wherever I had it would</p> <p>not have -- does not cause MEF immediate</p> <p>harm; so therefore, you guys don't get to</p> <p>delete everything in my phone.</p> <p>BY MR. CAVALIER:</p> <p>Q. Would you agree with me that</p> <p>according to this order, Judge Sanchez found that</p> <p>the Middle East Forum had established a</p> <p>reasonable likelihood of success on its trade</p> <p>secrets claims against you?</p>
<p style="text-align: right;">Page 69</p> <p>1 That's funny. Okay.</p> <p>2 Okay.</p> <p>3 Okay.</p> <p>4 Okay.</p> <p>5 Keep going.</p> <p>6 MR. CARSON: I think there's a way</p> <p>7 to just give her --</p> <p>8 THE DEPONENT: That's fine. I'm</p> <p>9 almost done. It's fine. I read very</p> <p>10 quickly. I'm almost done.</p> <p>11 Okay, sir. Keep going.</p> <p>12 All right.</p> <p>13 Stop.</p> <p>14 Sorry about that.</p> <p>15 Okay.</p> <p>16 Okay.</p> <p>17 That's fine. Thank you.</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. Okay. So having now read the</p> <p>20 January 8th, 2021, order, issued by Judge</p> <p>21 Sanchez, what is your understanding of what this</p> <p>22 order means?</p> <p>23 MR. CARSON: Objection. Calls for</p> <p>24 a legal conclusion.</p>	<p style="text-align: right;">Page 71</p> <p>MR. CARSON: Objection. Calls for</p> <p>a legal conclusion.</p> <p>You can answer if you understand</p> <p>the question.</p> <p>THE DEPONENT: So it's my</p> <p>understanding that he -- that a</p> <p>likelihood is not guaranteed, number one.</p> <p>And number two, there were times</p> <p>in that deposition where, you know, he --</p> <p>there were things that were evidence in</p> <p>that case that wasn't, like, presented</p> <p>so -- in the thing -- like I just -- the</p> <p>part where I said, oh, that's funny, he</p> <p>said that Amy Meckenberg, where her</p> <p>proposal that she submitted to MEF</p> <p>themselves, said she wasn't a competitor</p> <p>and was there to highlight the voices</p> <p>like organizations like MEF.</p> <p>And I was their communications</p> <p>director and that was my job.</p> <p>So when we have those things, like</p> <p>this doesn't -- this doesn't -- to me a</p> <p>likelihood is not guaranteed and so, you</p> <p>know, just because he ruled that given on</p>



<p>Page 72</p> <p>1 the short testimony that was given that</p> <p>2 day, I do not believe that it was there.</p> <p>3 And you're innocent until proven</p> <p>4 guilty. So this does not, you know,</p> <p>5 guarantee MEF that they -- that they</p> <p>6 do -- that, like, I did anything wrong,</p> <p>7 so...</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. And listen, as it happens, we</p> <p>10 agree on that.</p> <p>11 I'm certainly not insinuating that</p> <p>12 this is a final determination on the merits of</p> <p>13 that case.</p> <p>14 But it is fair to say, I think --</p> <p>15 you gave a rather long answer there, and I don't</p> <p>16 mean to make you repeat yourself.</p> <p>17 But quoting from the Judge's</p> <p>18 order, it's fair to say that he found a</p> <p>19 reasonable likelihood of success, right?</p> <p>20 MR. CARSON: Objection. Asked and</p> <p>21 answered. That was the exact question</p> <p>22 you just asked.</p> <p>23 Lisa, if you want to repeat the</p> <p>24 answer, go ahead.</p>	<p>Page 74</p> <p>1 MR. CARSON: Objection. You can</p> <p>2 answer.</p> <p>3 THE DEPONENT: Correct.</p> <p>4 However, when I started to speak</p> <p>5 about certain things, Judge Sanchez and</p> <p>6 the other lawyer made -- like limited me</p> <p>7 on those responses.</p> <p>8 There was one time where Judge</p> <p>9 Sanchez said, we're not going to go here,</p> <p>10 we're not doing this, we're not doing</p> <p>11 that. And then he just continued.</p> <p>12 So, I mean, he's the boss, so</p> <p>13 that's fine. But there was definitely a</p> <p>14 point in there where I was trying to</p> <p>15 address this specific part and I wasn't</p> <p>16 able to testify about it.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Did you argue before Judge Sanchez</p> <p>19 that this case was frivolous and filed only</p> <p>20 because the Middle East Forum was trying to</p> <p>21 retaliate against you?</p> <p>22 MR. CARSON: I'm going to object.</p> <p>23 Lisa didn't make any arguments. Her</p> <p>24 counsel did.</p>
<p>Page 73</p> <p>1 THE DEPONENT: The answer is</p> <p>2 that's what he wrote. That doesn't mean</p> <p>3 that given the evidence that this isn't</p> <p>4 frivolous or ridiculous, because it still</p> <p>5 is.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. So -- but Judge Sanchez didn't</p> <p>8 rule that it was frivolous, correct?</p> <p>9 A. I don't know what his defini --</p> <p>10 MR. CARSON: Objection. Wait. I</p> <p>11 object. Argumentative. Object to form.</p> <p>12 You can answer.</p> <p>13 THE DEPONENT: Judge Sanchez does</p> <p>14 not have -- did not have, in this</p> <p>15 hearing, a clear picture of everything,</p> <p>16 because I was limited to what people</p> <p>17 asked me and what was presented.</p> <p>18 So that's why this needs to --</p> <p>19 that's why this is proceeding.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. When you say you were limited to</p> <p>22 what people asked you, you gave a direct</p> <p>23 examination conducted by your counsel in that</p> <p>24 case, correct?</p>	<p>Page 75</p> <p>1 MR. CAVALIER: She's the party,</p> <p>2 Seth.</p> <p>3 MR. CARSON: And so it calls for a</p> <p>4 legal conclusion.</p> <p>5 And to the extent she understands</p> <p>6 the question -- I object to the form,</p> <p>7 too -- you can answer.</p> <p>8 THE DEPONENT: I honestly don't</p> <p>9 remember.</p> <p>10 I mean, I do remember that part,</p> <p>11 but I don't remember what I -- what we --</p> <p>12 I just was remembering answering the</p> <p>13 questions that were asked of me.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Would you agree with me that if</p> <p>16 the Middle East Forum ultimately prevails on his</p> <p>17 trade secrets claims, then they are, by</p> <p>18 definition, not frivolous?</p> <p>19 MR. CARSON: I'm going to object</p> <p>20 to that. It calls for a legal</p> <p>21 conclusion. It's also a hypothetical.</p> <p>22 I'll object to the form. You can answer.</p> <p>23 THE DEPONENT: I forget the</p> <p>24 question.</p>

<p>Page 76</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. The question is, do you agree with</p> <p>3 me that if the Middle East Forum ultimately</p> <p>4 prevails on its trade secrets claims against you,</p> <p>5 then they are by definition not frivolous?</p> <p>6 MR. CARSON: Same objection. You</p> <p>7 can answer.</p> <p>8 THE DEPONENT: I don't know if</p> <p>9 that's the legal standard for frivolous</p> <p>10 or not.</p> <p>11 What I do know is that there have</p> <p>12 been -- in the history of the court</p> <p>13 system, there have been many cases that</p> <p>14 have been found wrong or -- you know,</p> <p>15 there's even people sentenced to death</p> <p>16 that were wrongfully convicted.</p> <p>17 And so I still think that no</p> <p>18 matter what the outcome of this case is,</p> <p>19 that this is a frivolous and wrong and</p> <p>20 harassing lawsuit.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Is it fair to say that Judge</p> <p>23 Sanchez disagrees with that statement?</p> <p>24 MR. CARSON: Objection. You want</p>	<p>Page 78</p> <p>1 a donor list is considered a trade</p> <p>2 secret. Personally I would agree with</p> <p>3 that.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. And Judge Sanchez agrees with that</p> <p>6 as well, correct?</p> <p>7 MR. CARSON: Objection. The order</p> <p>8 speaks for itself.</p> <p>9 THE DEPONENT: I don't know what</p> <p>10 he agrees with. I just know what he</p> <p>11 wrote.</p> <p>12 MR. CARSON: Just for the court</p> <p>13 reporter, if there's an objection, you</p> <p>14 got to slow this thing down a little.</p> <p>15 THE DEPONENT: I keep forgetting</p> <p>16 you're objecting. It's hard to hear you</p> <p>17 sometimes.</p> <p>18 MR. CARSON: I'm sorry. Same</p> <p>19 objection as last time.</p> <p>20 Calls for legal conclusion asking</p> <p>21 what the Judge thinks. Object to form.</p> <p>22 You can answer.</p> <p>23 THE DEPONENT: Like I said, he</p> <p>24 said from what he had so far, that it</p>
<p>Page 77</p> <p>1 her to testify -- wait. Wait. Wait.</p> <p>2 You're asking her to testify to</p> <p>3 what a judge thinks?</p> <p>4 To the extent you know what Judge</p> <p>5 Sanchez thinks, you can answer the</p> <p>6 question.</p> <p>7 THE DEPONENT: Well, that was</p> <p>8 gonna be my answer. I don't know what</p> <p>9 Sanchez thinks.</p> <p>10 All I know is what he wrote. And</p> <p>11 this case has not been decided. And when</p> <p>12 it is decided, maybe we can make an</p> <p>13 accurate decision on what Judge Sanchez</p> <p>14 thinks.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. Having now read Judge Sanchez's</p> <p>17 order, do you agree that Judge Sanchez found that</p> <p>18 the Middle East Forum's donor lists and</p> <p>19 prospective donors constitutes trade secrets?</p> <p>20 MR. CARSON: Objection. The order</p> <p>21 speaks for itself. It calls for a legal</p> <p>22 conclusion. Object to the form.</p> <p>23 You can answer.</p> <p>24 THE DEPONENT: I would agree that</p>	<p>Page 79</p> <p>1 was.</p> <p>2 However, I never gave a donor</p> <p>3 list -- a complete donor list to anyone,</p> <p>4 nor do I have access to it, nor did I</p> <p>5 ever have access to it.</p> <p>6 So the list that I gave was stuff</p> <p>7 that you could get from the internet.</p> <p>8 And we established that.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. But Judge --</p> <p>11 A. As a matter of fact, I think it</p> <p>12 said in the ruling there --</p> <p>13 MR. CARSON: Wait for a question.</p> <p>14 THE DEPONENT: I'll wait for a</p> <p>15 question.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. But Judge Sanchez said in his</p> <p>18 order that the donor information sent to Amy</p> <p>19 Meckenberg on April 11, 2019, was not public</p> <p>20 information, correct?</p> <p>21 A. Negative. It says right under</p> <p>22 there, further discovery may shed light on</p> <p>23 whether -- hold on -- stop scrolling.</p> <p>24 Further discovery may shed light</p>

<p>Page 80</p> <p>1 on whether all the information contained in the</p> <p>2 donor list was, in fact, publicly and readily</p> <p>3 available to Meckenberg.</p> <p>4 So, therefore, the Judge -- the</p> <p>5 Judge ruled that there's further investigation</p> <p>6 needed.</p> <p>7 So it still may very well be, in</p> <p>8 the Court's eyes, frivolous.</p> <p>9 Q. Where do you go from what you just</p> <p>10 said to frivolous?</p> <p>11 MR. CARSON: Objection.</p> <p>12 Argumentive.</p> <p>13 You can answer.</p> <p>14 THE DEPONENT: Because I didn't do</p> <p>15 anything wrong. And this lawsuit is</p> <p>16 trying to twist an innocuous thing that I</p> <p>17 actually did to help the Middle East</p> <p>18 Forum into something nefarious.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. Still you would agree with me,</p> <p>21 would you not, that Judge Sanchez wrote that the</p> <p>22 forum has presented sufficient evidence to</p> <p>23 demonstrate a likelihood of success on its claim</p> <p>24 that the donor information was a trade secret,</p>	<p>Page 82</p> <p>1 is frivolous?</p> <p>2 A. He could have --</p> <p>3 MR. CARSON: Wait. Wait.</p> <p>4 Objection.</p> <p>5 I think we're back into the MEF</p> <p>6 cinematic universe where we're going on</p> <p>7 hypothetical? So I object to the form.</p> <p>8 You can answer.</p> <p>9 THE DEPONENT: And that's where I</p> <p>10 was going to go. Could have, should</p> <p>11 have. I don't know what he could have</p> <p>12 done, what he may have done.</p> <p>13 I'm not a legal expert. I don't</p> <p>14 know what the technicalities are. I</p> <p>15 don't know what he is supposed to write.</p> <p>16 I'm not a judge.</p> <p>17 All I know is that I never did</p> <p>18 anything nefarious ever to the Middle</p> <p>19 East Forum. And they are making me out</p> <p>20 to be something that isn't true.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. What is your understanding of what</p> <p>23 the Forum is demanding in its effort to obtain a</p> <p>24 preliminary injunction against you?</p>
<p>Page 81</p> <p>1 correct?</p> <p>2 MR. CARSON: Objection. The</p> <p>3 document speaks for itself. You can</p> <p>4 answer whether or not the sentence</p> <p>5 says --</p> <p>6 THE DEPONENT: Answered this a</p> <p>7 whole million times.</p> <p>8 That is -- that statement is just</p> <p>9 saying that they have a likelihood to</p> <p>10 proceed. Right?</p> <p>11 But it still needs further</p> <p>12 investigation.</p> <p>13 I mean, it's very clear. The</p> <p>14 document is very clear. And I don't know</p> <p>15 why I have to keep answering the same</p> <p>16 question over and over again.</p> <p>17 You're not going to get, yes, I</p> <p>18 agree with you out of it, because I</p> <p>19 don't.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. But Judge Sanchez could have</p> <p>22 written, for example, the Middle East Forum has</p> <p>23 presented no evidence to demonstrate a likelihood</p> <p>24 of success on its claim, and therefore, its claim</p>	<p>Page 83</p> <p>1 MR. CARSON: Objection. Calls for</p> <p>2 a legal conclusion. Calls for</p> <p>3 speculation. Object to the form.</p> <p>4 You can answer.</p> <p>5 THE DEPONENT: So they --</p> <p>6 they're -- what they say their intent is</p> <p>7 is for me to get rid of any information</p> <p>8 that I have pertaining to MEF on my</p> <p>9 phone.</p> <p>10 However, in that -- in their</p> <p>11 request, they wanted to get rid of all of</p> <p>12 the things that hit on search terms.</p> <p>13 However, there was many things</p> <p>14 that hit under the search terms given</p> <p>15 that were unrelated to this case. Many.</p> <p>16 And we're talking about, like,</p> <p>17 thousands and thousands of things that</p> <p>18 were unrelated to this case.</p> <p>19 Just because they hit because it</p> <p>20 had the letters M-E in it or something</p> <p>21 else, doesn't mean that it's relevant to</p> <p>22 MEF.</p> <p>23 So you can't just go in my</p> <p>24 documents and erase half my life because</p>

<p style="text-align: right;">Page 84</p> <p>1 it came up on some erroneous search term.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. You, at least, agree then that</p> <p>4 they have the right to have you remove the</p> <p>5 documents that are actually MEF documents?</p> <p>6 MR. CARSON: Objection. Calls for</p> <p>7 a legal conclusion. Object to the form.</p> <p>8 This document speaks for itself.</p> <p>9 You can answer if you understand</p> <p>10 what he's asking you.</p> <p>11 THE DEPONENT: I understand that I</p> <p>12 am -- what I do understand about this is</p> <p>13 that I am willing to delete or</p> <p>14 whatever -- I happily will delete any MEF</p> <p>15 documents or anything that I have. I do</p> <p>16 not want them. I do not need them.</p> <p>17 But you do not get to go into my</p> <p>18 entire phone and erase half my life. And</p> <p>19 so if -- you know, that's it. Like that</p> <p>20 is it.</p> <p>21 Like I don't -- there is no</p> <p>22 circumstance where you get to, you know,</p> <p>23 erase pictures of my kids from when they</p> <p>24 were three weeks old.</p>	<p style="text-align: right;">Page 86</p> <p>1 they have -- the hits were anything --</p> <p>2 the agreement was to erase anything that</p> <p>3 came up on the hits for the search terms.</p> <p>4 And the search terms included far more</p> <p>5 than what was MEF documents.</p> <p>6 And we've tried to work with your</p> <p>7 side to have this corrected. And -- and</p> <p>8 I've done my -- we've done our share.</p> <p>9 You guys want to go into my phone</p> <p>10 and delete everything. You have</p> <p>11 passwords to everything in my phone. You</p> <p>12 have all of my personal information</p> <p>13 dating back to further than this case</p> <p>14 starts. Further back from my employment</p> <p>15 with MEF. You have everything.</p> <p>16 And the funny thing is, it only</p> <p>17 turned up one -- this whole thing is on</p> <p>18 the Judge's order is on one e-mail sent</p> <p>19 in 2019 while I still worked for the</p> <p>20 Middle East Forum.</p> <p>21 We're not talking about -- the</p> <p>22 Judge ruled on one. I was in there on</p> <p>23 that hearing. And he said the only thing</p> <p>24 that MEF showed is that she sent one</p>
<p style="text-align: right;">Page 85</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Right.</p> <p>3 But if -- for example, a third</p> <p>4 party was hired to go through your information</p> <p>5 and delete only that which was MEF's and not your</p> <p>6 personal information, you wouldn't have a problem</p> <p>7 with that then, right?</p> <p>8 MR. CARSON: I'm gonna object to</p> <p>9 the form.</p> <p>10 THE DEPONENT: Hypothetically</p> <p>11 speaking --</p> <p>12 MR. CARSON: Let me put the</p> <p>13 objection on.</p> <p>14 THE DEPONENT: Hurry up.</p> <p>15 MR. CARSON: I will object to the</p> <p>16 form of the question. It's hypothetical</p> <p>17 again.</p> <p>18 You can answer.</p> <p>19 THE DEPONENT: But anyway, like I</p> <p>20 said, hypothetically speaking, if it was</p> <p>21 easy, then, yeah, there would be no</p> <p>22 problem with that.</p> <p>23 However, we have been told</p> <p>24 numerous times that that is not -- that</p>	<p style="text-align: right;">Page 87</p> <p>1 e-mail that was -- that could qualify as</p> <p>2 this.</p> <p>3 That's what he said, one e-mail</p> <p>4 that could qualify as this.</p> <p>5 And -- and honestly, it was during</p> <p>6 my time of employment to help the Middle</p> <p>7 East Forum.</p> <p>8 And so this is all boiling down to</p> <p>9 one e-mail while I was still employed in</p> <p>10 April, or whatever month it was, of 2019.</p> <p>11 One document. One e-mail.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Regardless of your views on what</p> <p>14 evidence showed and didn't show in front of Judge</p> <p>15 Sanchez --</p> <p>16 A. I'm going by what Judge Sanchez</p> <p>17 said. Were you in that hearing? I don't</p> <p>18 remember.</p> <p>19 MR. CARSON: Let him get the</p> <p>20 question out.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. You would agree with me, though,</p> <p>23 would you not, that separate and apart from your</p> <p>24 personal information, whatever mechanism is</p>



<p>Page 88</p> <p>1 agreed to to remove the information, that the 2 Forum does have a right to have you remove Middle 3 East Forum information from your personal 4 devices, correct?</p> <p>5 MR. CARSON: I'm gonna object 6 again. Asked and answered. Object to 7 the form. Calls for a legal conclusion. 8 There's also a litigation hold on 9 this case, which would preclude her from 10 doing what you're talking about. 11 To the extent that she can answer, 12 she can. Lisa, you can answer the 13 question. 14 THE DEPONENT: I don't want -- I 15 don't know how to answer this question, 16 because I don't want MEF information on 17 my phone. I don't want it. I want 18 nothing to do with them. 19 So if I could do it where I don't 20 have to get my -- like that my stuff 21 wouldn't be touched, then I would 22 happily, happily, happily sit in a room 23 with whatever third party you want and go 24 over the documents.</p>	<p>Page 90</p> <p>1 objection. 2 MR. CAVALIER: I don't need you to 3 explain it. 4 THE DEPONENT: I heard your side 5 do that, too. Sorry, sir. 6 MR. CARSON: Yeah. Look -- 7 MR. CAVALIER: You never heard me 8 make a form objection in a deposition. 9 MR. CARSON: I will put the 10 objections on the record that I feel are 11 appropriate. 12 So the objection is noted. 13 To the extent that you understand 14 the question, you can answer. 15 BY MR. CAVALIER: 16 Q. After your counsel's soliloquy, 17 did you even remember the question? 18 A. Something about instructing 19 Patricia McNulty to do something. 20 Q. Did you ever instruct Tricia 21 McNulty to wipe an MEF iPad? 22 MR. CARSON: Same objection. You 23 can answer. 24 THE DEPONENT: Marnie Meyer told</p>
<p>Page 89</p> <p>1 No. Like, you know, they can have 2 whatever they want. I don't want it. 3 Don't want it. 4 BY MR. CAVALIER: 5 Q. Okay. Did you ever instruct 6 Patricia McNulty to wipe her MEF notepad? 7 MR. CARSON: Objection. Assuming 8 facts not in evidence. 9 MR. CAVALIER: Assuming facts not 10 in evidence is not a proper objection. 11 MR. CARSON: Yeah, it is. It's a 12 form objection. It totally is. Assuming 13 facts not in evidence. Lack of 14 foundation. Object to the form. 15 MR. CAVALIER: Foundation is not a 16 proper objection in a deposition. 17 MR. CARSON: It actually is. It's 18 a form objection. Foundation and 19 assuming facts not in evidence, those are 20 the two types of form. 21 MR. CAVALIER: Then say object to 22 form. 23 MR. CARSON: No, I'm gonna tell ya 24 -- I'm gonna explain the basis for my</p>	<p>Page 91</p> <p>1 us to wipe and get all our personal 2 information off of our devices, to 3 restore them to factory settings so that 4 people could use them. 5 When I logged into -- when I 6 logged into my iPad. Right? Or the MEF 7 iPad, I did so with my personal iCloud, 8 which you guys have complete access to. 9 Okay? 10 So I did that. But to save -- to 11 keep me protected from Greg Roman knowing 12 all my passwords and all my stuff, I had 13 to take my personal information off of 14 the iPad. 15 And since I was not there to do 16 it, I asked her to do it for me, because 17 that is what you're supposed to do. 18 My personal information. Taking 19 me off the iCloud thing so that they 20 don't have access to my personal 21 pictures, my personal e-mail, my personal 22 passwords to my bank accounts. 23 All that stuff is saved on your 24 iCloud and, no, MEF is not entitled to</p>

<p>1 that.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. When did you give her that</p> <p>4 instruction?</p> <p>5 A. I don't remember.</p> <p>6 Q. Was it before or after you left</p> <p>7 the Forum?</p> <p>8 A. It was probably after I left the</p> <p>9 Forum.</p> <p>10 Q. Did you think it was proper for</p> <p>11 you to be storing personal information of the MEF</p> <p>12 corporate iCloud?</p> <p>13 A. We were told to.</p> <p>14 MR. CARSON: I'm going to object</p> <p>15 to the question as argumentative. Object</p> <p>16 to form.</p> <p>17 THE DEPONENT: It's not storing --</p> <p>18 it's not storing personal information.</p> <p>19 There were times where I needed to</p> <p>20 purchase things, like equipment, for work</p> <p>21 and things like that.</p> <p>22 And we did so out of our Amazon</p> <p>23 accounts. And so for us to -- for me to</p> <p>24 do that and order it on the iPad and to</p>	<p>Page 92</p> <p>1 THE DEPONENT: The question was --</p> <p>2 court reporter, can repeat the question</p> <p>3 for me, please?</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. The question is, at the time you</p> <p>6 gave Patricia McNulty the instruction to delete</p> <p>7 your personal information from the MEF corporate</p> <p>8 iPad, did you tell anyone else at MEF that you</p> <p>9 were giving her that instruction?</p> <p>10 A. Okay. So, A, I didn't speak to</p> <p>11 anybody other than Tricia McNulty after -- I</p> <p>12 really didn't -- well, regularly, didn't speak to</p> <p>13 anybody after the -- after that.</p> <p>14 And it was Tricia McNulty who</p> <p>15 alerted me that my personal information was still</p> <p>16 on the iPad.</p> <p>17 So she's the reason -- and I said</p> <p>18 oh, can you please take it off.</p> <p>19 I mean, she alerted me that my</p> <p>20 personal info was still on that iPad, because I</p> <p>21 didn't remember. And she brought it to my</p> <p>22 attention.</p> <p>23 And so I said, oh, thanks. Take</p> <p>24 it off. Yes. I don't want Greg Roman having my</p>
<p>Page 93</p> <p>1 do other things and to use an iPad, you</p> <p>2 have to log in with your iCloud. That's</p> <p>3 how it works.</p> <p>4 And that is what we were</p> <p>5 instructed to do. When he handed me the</p> <p>6 iPad, set it up, log into your iCloud,</p> <p>7 it's yours, blah, blah, blah.</p> <p>8 So, yes. Yes, I do think it's</p> <p>9 proper, because that's what I was told to</p> <p>10 do. That was in answer to your question.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Did you tell anybody other than</p> <p>13 Patricia McNulty that you were issuing that</p> <p>14 instruction?</p> <p>15 MR. CARSON: Objection. What</p> <p>16 instruction are we talking about?</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. The instruction to clear the</p> <p>19 information from the corporate iPad.</p> <p>20 MR. CARSON: Objection. You keep</p> <p>21 using words like clear and wipe. That's</p> <p>22 not what she testified to. So I'll</p> <p>23 object to the form.</p> <p>24 You can answer.</p>	<p>Page 94</p> <p>1 personal information.</p> <p>2 He's already knee deep in all my</p> <p>3 whole life.</p> <p>4 Q. Well, I mean, if it was already on</p> <p>5 the corporate iPad, he already had access to it,</p> <p>6 didn't he?</p> <p>7 A. Right. But when -- you don't</p> <p>8 understand what a tyrant Greg is.</p> <p>9 Okay?</p> <p>10 So when -- you do anything wrong,</p> <p>11 like quit or, you know, -- or whatever, do</p> <p>12 something Greg doesn't like -- and he didn't have</p> <p>13 access to it while it was in my possession.</p> <p>14 So, like, that was given to me as</p> <p>15 my iPad. And it was at my desk and I always had</p> <p>16 it, like, when I worked there.</p> <p>17 When I left, I forgot to take my</p> <p>18 personal information off of it. So they were</p> <p>19 going to use it, the MEF iPad, which was when</p> <p>20 they gave it to me, just like they gave me a</p> <p>21 computer.</p> <p>22 So when I took my information</p> <p>23 off -- so when I had it, Greg didn't have access</p> <p>24 to the MEF iPad. We put our stuff -- all the</p>
<p>Page 95</p>	<p>Page 95</p>



<p>Page 96</p> <p>1 stuff, though, that was on that iPad is now in 2 your hands.</p> <p>3 It was my iCloud, because you 4 can't save things to it particularly. It was in 5 my iCloud or it was on the MEF One Drive.</p> <p>6 So, no, like, you guys have 7 anything that would be in there. All that was 8 doing in that moment was protecting me from 9 having Greg have my personal credit card, 10 banking, family, e-mail, all that.</p> <p>11 There's nothing wrong with that.</p> <p>12 Q. So you deleted your iCloud account 13 because you didn't want MEF --</p> <p>14 A. I didn't delete an iCloud account. 15 I deleted -- I took my iCloud account off of that 16 device.</p> <p>17 Well, I didn't. I asked Tricia to 18 do it.</p> <p>19 But I took it off that device. 20 All iCloud stuff is still -- you have it. You 21 guys have all the log-ins and passwords to it. 22 You have it all. It's still there.</p> <p>23 The iCloud exists.</p> <p>24 All I did was remove my personal</p>	<p>Page 98</p> <p>1 removed the log-in credentials so that 2 you couldn't access her iCloud from a 3 certain device that she didn't have 4 access to it anymore.</p> <p>5 THE DEPONENT: Right.</p> <p>6 MR. CARSON: Her testimony was 7 pretty clear, and the record will 8 demonstrate that. So I think that we've 9 covered this subject.</p> <p>10 And I think any more questions 11 about this are in improper. But you can 12 ask her and I'll just put the objection 13 on the record.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Are you aware of the fact that 16 when you sign in into an iCloud account on an 17 iPad, the iPad will download information from 18 that iCloud account and store it locally until 19 iCloud account is removed?</p> <p>20 MR. CARSON: Objection. Assuming 21 facts not in evidence. You can answer.</p> <p>22 THE DEPONENT: I am not aware of 23 that.</p> <p>24 I thought that it's all</p>
<p>Page 97</p> <p>1 information, my log-in credentials and all that 2 stuff off of that device.</p> <p>3 MR. CARSON: Yeah. I also don't 4 appreciate questions where you totally 5 mischaracterize her prior testimony.</p> <p>6 So I'm just going to object to the 7 whole question that you just asked.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. You didn't review the information 10 before you instructed Patricia McNulty to take it 11 off the iPad, correct?</p> <p>12 MR. CARSON: I'll object to the 13 form.</p> <p>14 What information are you talking 15 about? Review what?</p> <p>16 MR. CAVALIER: The information in 17 your iCloud.</p> <p>18 MR. CARSON: What do you mean -- 19 John, what -- your question demonstrates 20 an utter lack of understanding, which 21 seems purposeful for the testimony of my 22 client just said. There was no 23 information.</p> <p>24 She testified that she just</p>	<p>Page 99</p> <p>1 cloud-based and it's in the cloud and it 2 accesses the cloud. It doesn't download 3 any information to the machine itself. 4 And that's how you save on storage.</p> <p>5 So I think that your 6 characterization of that is incorrect.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. Did you review the contents of the 9 iCloud account before you instructed Patricia 10 McNulty to remove the iCloud account from the MEF 11 laptop?</p> <p>12 A. It's e-mail and password.</p> <p>13 MR. CARSON: I objected. And 14 Lisa, go ahead.</p> <p>15 THE DEPONENT: It's an e-mail and 16 password.</p> <p>17 What is there to review?</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. It's a simple yes or no question. 20 Did you review the contents of 21 your iCloud account before you instructed 22 Patricia McNulty to remove access to that account 23 from the MEF corporate iPad?</p> <p>24 MR. CARSON: I'm gonna object to</p>

<p style="text-align: right;">Page 100</p> <p>1 the question. Object to the form. You</p> <p>2 can answer.</p> <p>3 THE DEPONENT: Yes, I removed -- I</p> <p>4 knew my -- I reviewed my e-mail and</p> <p>5 password, yes.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Did you review the contents of</p> <p>8 your iCloud account before instructing Patricia</p> <p>9 McNulty to remove that account from the MEF</p> <p>10 corporate iPad?</p> <p>11 MR. CARSON: Objection. That's</p> <p>12 the same question you just asked twice.</p> <p>13 Asked and answered.</p> <p>14 Lisa, go ahead.</p> <p>15 THE DEPONENT: Did I -- sorry.</p> <p>16 So I'm understanding your question</p> <p>17 to be, did I scour through every single</p> <p>18 thing on my iCloud, including all of my</p> <p>19 20,000 pictures and my 20,000 messages</p> <p>20 and my 20,000 e-mails and my 20,000,</p> <p>21 whatever, Google drive documents? Did I</p> <p>22 do that?</p> <p>23 No, I'm sorry.</p> <p>24</p>	<p style="text-align: right;">Page 102</p> <p>1 Q. Do you think --</p> <p>2 MR. CARSON: Guys, finish this</p> <p>3 question, then I need to use the</p> <p>4 restroom.</p> <p>5 THE DEPONENT: Sir, if that was</p> <p>6 the case -- if that was the case -- let</p> <p>7 me finish.</p> <p>8 If that was the case, that it</p> <p>9 stored the information locally, then I</p> <p>10 would have no storage space in my phone</p> <p>11 whatsoever, because I have 30,000</p> <p>12 pictures on my phone.</p> <p>13 You only get 168 gigabytes of</p> <p>14 storage on an iPhone. So if it stored it</p> <p>15 locally, my phone would not be able to</p> <p>16 operate, given the capacity -- its memory</p> <p>17 capacity.</p> <p>18 MR. CARSON: Hold on. With that,</p> <p>19 let's take a five-minute break or</p> <p>20 bathroom break.</p> <p>21 MR. CAVALIER: Yeah, I'm good with</p> <p>22 that, as long as you make it 10. You</p> <p>23 know I don't like five-minute breaks.</p> <p>24 THE VIDEOGRAPHER: The time is</p>
<p style="text-align: right;">Page 101</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Now, you brought up Google Drive.</p> <p>3 Google Drive is not part of iCloud, correct?</p> <p>4 A. Yes, actually it is.</p> <p>5 What happens is, when you log</p> <p>6 into -- when you log into your iCloud, it stores</p> <p>7 all your apps. Okay?</p> <p>8 And when your apps are stored</p> <p>9 there -- okay. When your apps are stored in the</p> <p>10 thing, when it re-populates -- so say I take my</p> <p>11 device right now, right? My phone. And I have</p> <p>12 an app on there, which is Google Drive. Right?</p> <p>13 When I take that app and I log in</p> <p>14 with my user name and password for iCloud, and I</p> <p>15 put it on another device, say I get a new phone,</p> <p>16 say I get whatever, okay, that information from</p> <p>17 there, it will bring the app and all the contents</p> <p>18 of the app back onto my phone.</p> <p>19 Q. Locally?</p> <p>20 A. No. From the cloud.</p> <p>21 Q. Right.</p> <p>22 It comes from the cloud and is</p> <p>23 stored on your phone --</p> <p>24 A. It is not stored on your phone.</p>	<p style="text-align: right;">Page 103</p> <p>1 12:02 p.m.</p> <p>2 We're off the record</p> <p>3 The time is 12:16 p.m.</p> <p>4 (Recess taken.)</p> <p>5 THE VIDEOGRAPHER: We are back on</p> <p>6 the record.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. Ms. Barbounis, did you instruct</p> <p>9 Patricia McNulty to, quote, delete my pictures,</p> <p>10 end quote, from the MEF corporate backup?</p> <p>11 A. I mean, you seem to be quoting me,</p> <p>12 so I guess so.</p> <p>13 Q. Okay.</p> <p>14 MR. CARSON: Well, Lisa, don't</p> <p>15 guess.</p> <p>16 If you remember doing it, then say</p> <p>17 you remember. If not, then just say and</p> <p>18 let them know that. Don't guess.</p> <p>19 THE DEPONENT: I'm sorry. I don't</p> <p>20 remember. I shouldn't be guessing. I</p> <p>21 don't actually remember.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. That's all right. That's always a</p> <p>24 fair answer.</p>

<p>Page 104</p> <p>1 At the time -- well, let me ask 2 you this.</p> <p>3 Does August, September 2019 strike 4 you as an accurate time frame as to when you gave 5 Patricia McNulty this instruction?</p> <p>6 A. I got my job at the end of August. 7 So probably.</p> <p>8 Q. Okay. At that point in time had 9 you and Patricia McNulty discussed your claims 10 against the Middle East Forum that you brought in 11 this case?</p> <p>12 A. I don't know.</p> <p>13 Q. Do you know whether or not at that 14 time Patricia McNulty was contemplating an action 15 against the Middle East Forum?</p> <p>16 A. I think we already filed in court. 17 I don't know.</p> <p>18 Q. So I'll represent to you -- well, 19 I'll ask it to you this way.</p> <p>20 If Patricia McNulty had already 21 filed in court, did you think it was appropriate 22 to be giving a plaintiff in an action against MEF 23 an instruction to delete information from an MEF 24 device?</p>	<p>Page 106</p> <p>1 Q. Did you produce information from 2 your Facebook account in this case?</p> <p>3 A. Yes.</p> <p>4 Q. Are you certain of that?</p> <p>5 A. Yes.</p> <p>6 Q. My understanding is that you are 7 going to be making a production of your Facebook 8 information in the trade secrets case at some 9 point today, is that correct?</p> <p>10 MR. CARSON: Objection.</p> <p>11 THE DEPONENT: I guess so. I 12 don't know.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. If I represent to you that you 15 have not -- or we have never received any 16 Facebook information in this case, will you agree 17 to produce to us the Facebook information that 18 you're producing in the trade secrets case?</p> <p>19 MR. CARSON: I'm going to object. 20 I'm gonna instruct her not to answer that 21 question. It's something she has to talk 22 to me about.</p> <p>23 THE DEPONENT: I just want to make 24 it clear for the record that I gave Kep</p>
<p>Page 105</p> <p>1 MR. CARSON: I'm gonna object. 2 She already testified that the 3 information wasn't deleted. 4 Go ahead, Lisa.</p> <p>5 THE DEPONENT: You asked me 6 whether I think it's proper. 7 I think it is proper when it was 8 the policy to remove our personal iCloud 9 information from the devices, that that 10 is what I asked -- I didn't instruct her, 11 I asked her to do it.</p> <p>12 So, I mean, I didn't instruct -- 13 like, I have no -- you know, supervisory 14 anything over Tricia McNulty.</p> <p>15 If I asked her to do something, I 16 asked her to do it. And she has the full 17 wherewithal to make that decision on her 18 own.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. Do you know whether or not she 21 did, in fact, carry out your request?</p> <p>22 A. I believe that she did. I don't 23 know for a fact, because I never had access to 24 anything after that.</p>	<p>Page 107</p> <p>1 Secum or whoever it is the people that is 2 doing this.</p> <p>3 I gave them all of my Facebook 4 data and log in information not once, not 5 twice, but threes times. They have 6 everything. They have access to my full 7 Facebook.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. When did you give them that 10 information?</p> <p>11 A. Multiple times. I gave it to him 12 then when the first request for discovery came 13 in. And then the guy, Kevin or Kyle or whatever 14 his name is, called me and said, hey, we didn't 15 get to pull this one part, because, you know, 16 it's connected with Congressman Weber's account 17 or whatever.</p> <p>18 And then he was, like, can you 19 give me the log in again. And do two factor 20 authentication again and I did.</p> <p>21 And then he called me back and 22 asked me to do it a third time. That has to 23 be -- the last time that happened was months ago. 24 My brother got married in the beginning of</p>

<p style="text-align: right;">Page 108</p> <p>1 December and I remember it being around that</p> <p>2 time, because I was, like, -- like doing stuff</p> <p>3 from my brother's wedding.</p> <p>4 Q. Beginning of December 2020?</p> <p>5 A. That was the last time that I did</p> <p>6 it.</p> <p>7 But originally before that it had</p> <p>8 to have been six, seven, eight months before</p> <p>9 that. Like -- yeah.</p> <p>10 I mean, I've given them the log-in</p> <p>11 credentials on numerous occasions.</p> <p>12 Q. Okay. So as far as you know, it's</p> <p>13 your belief sitting here today in the deposition</p> <p>14 that you have produced the information from your</p> <p>15 Facebook page to us in this case?</p> <p>16 A. Hundred percent. Yes, sir.</p> <p>17 Q. Okay. Can you describe for me</p> <p>18 the -- if you need to define these terms, that's</p> <p>19 fine -- but the hierarchy or the chain of command</p> <p>20 at MEF in 2018 and 2019?</p> <p>21 A. The chain of command?</p> <p>22 Q. Yes.</p> <p>23 A. It was a very weird kind of thing.</p> <p>24 Marnie at one point laid out with -- Greg and</p>	<p style="text-align: right;">Page 110</p> <p>1 Greg was always the boss and he</p> <p>2 still is.</p> <p>3 Q. Well, let's be accurate and not</p> <p>4 exaggerate or engage in hyperbole here.</p> <p>5 You said Greg made all the</p> <p>6 decisions. You don't know that to be the case,</p> <p>7 correct?</p> <p>8 A. Okay. That's fair.</p> <p>9 I do not know that he made every</p> <p>10 single, solitary decision.</p> <p>11 But I can tell you, that for all</p> <p>12 the big decisions that I witnessed in that place</p> <p>13 from working there for two years, that Greg made</p> <p>14 the ultimate decision.</p> <p>15 And if Daniel disagreed with him</p> <p>16 even, that they would argue it out or whatever</p> <p>17 and Greg would always triumph.</p> <p>18 Q. Okay. And so, again, just so</p> <p>19 we're all clear for the record, you know that</p> <p>20 about those decisions because you -- that Greg</p> <p>21 made, because you were either a part of those</p> <p>22 decisions or you were present when Greg was</p> <p>23 making them, correct?</p> <p>24 A. Yes. And I was -- well, not -- I</p>
<p style="text-align: right;">Page 109</p> <p>1 Marnie laid out an organizational chart.</p> <p>2 And it was Greg at the top, then</p> <p>3 like -- like, Marnie, me -- like, Marnie -- well,</p> <p>4 kind of -- I had my own, like, box over to the</p> <p>5 side, because I was Greg's assistant.</p> <p>6 And then, like, -- so they were</p> <p>7 kind of, like, -- like all on the same level, but</p> <p>8 it was, like, I was over to the side.</p> <p>9 And then, like, it went down and</p> <p>10 it was Marnie, Matt, and then the people that are</p> <p>11 underneath them.</p> <p>12 Q. Okay. So let's talk about those</p> <p>13 people.</p> <p>14 So you said Greg Roman at the top</p> <p>15 for all intents and purposes, it's actually</p> <p>16 Daniel Pipes at the top of the chain, right?</p> <p>17 A. For all intents and purposes, Greg</p> <p>18 Roman made all the decisions and even kept Daniel</p> <p>19 Pipes out of a lot of those decisions, including</p> <p>20 the website and how much money he was spending</p> <p>21 and all that kind of stuff.</p> <p>22 He didn't inform Greg Roman about</p> <p>23 our benefit -- or Greg Roman didn't inform Daniel</p> <p>24 Pipes about other benefit packages.</p>	<p style="text-align: right;">Page 111</p> <p>1 was not a part of them. So that's not -- that's</p> <p>2 an improper characterization.</p> <p>3 I witnessed them, yes. And</p> <p>4 then -- and then I also was instructed not to go</p> <p>5 to Daniel.</p> <p>6 I actually got in trouble via</p> <p>7 e-mail once for going to Daniel -- or copying him</p> <p>8 on an e-mail when it was Greg was supposed to be</p> <p>9 there. We were very -- Greg isolated us from</p> <p>10 Daniel very much.</p> <p>11 Q. How much interaction did you have</p> <p>12 with Daniel Pipes while you were at the Forum?</p> <p>13 A. Probably -- I mean, over e-mail?</p> <p>14 A lot.</p> <p>15 But he was in and out of the</p> <p>16 office. Hardly there at all. Because Greg was</p> <p>17 like, you know, ran the show.</p> <p>18 Daniel Pipes specifically said</p> <p>19 that he likes to do -- you know, speak and write</p> <p>20 and read and research. And that he is not</p> <p>21 interested in anything administrative whatsoever.</p> <p>22 Q. Still, it's fair to say, is it</p> <p>23 not, that to the extent that Daniel Pipes is</p> <p>24 making decisions that you did not observe, you</p>



<p>1 wouldn't know that he was making them, correct?</p> <p>2 A. Let's say this again.</p> <p>3 I have watched Greg Roman make</p> <p>4 major huge, huge, decisions for MEF without the</p> <p>5 input of Daniel Pipes whatsoever on multiple</p> <p>6 occasions.</p> <p>7 So Greg Roman ran the show.</p> <p>8 Q. I understand what you're saying</p> <p>9 with respect to what you observed.</p> <p>10 But if you didn't observe --</p> <p>11 A. I don't know what I don't know.</p> <p>12 Q. Right.</p> <p>13 So you don't know whether Daniel</p> <p>14 Pipes was making decisions that did or did not</p> <p>15 involve Greg Roman, unless you were there to</p> <p>16 observe it, correct?</p> <p>17 A. Correct.</p> <p>18 However, I have witnessed on</p> <p>19 multiple occasions Greg Roman making decisions</p> <p>20 that Daniel Pipes had no knowledge of and still</p> <p>21 to this day Dr. Pipes has confirmed he had no</p> <p>22 knowledge of those decisions.</p> <p>23 Q. You say that in a way -- and I</p> <p>24 don't mean to read into your tone here, so if I'm</p>	<p>Page 112</p> <p>1 And so then he retracted our</p> <p>2 benefits to only paying a third and then was</p> <p>3 going to phase them out. He did not know that.</p> <p>4 He also did not know, and he put</p> <p>5 this in an e-mail as well, that Greg Roman spent</p> <p>6 \$400,000 on an e-mail -- I mean, on a new website</p> <p>7 platform.</p> <p>8 Now, he knew we were upgrading the</p> <p>9 website. He didn't know how much was spent.</p> <p>10 When he found out, not only was he horrified, he</p> <p>11 told us all about it, that he did not know that</p> <p>12 that was there.</p> <p>13 He has admitted to numerous things</p> <p>14 that Greg has done that he knew nothing about.</p> <p>15 Q. Okay. So that's -- that-- I just</p> <p>16 heard you talk about two decisions that Greg made</p> <p>17 without Daniel's knowledge.</p> <p>18 A. There were so many of them. I</p> <p>19 couldn't sit here and list them all day. We</p> <p>20 would be here forever.</p> <p>21 Q. But my question to you is more</p> <p>22 broad than that.</p> <p>23 You talked earlier about many</p> <p>24 decisions, lots of things that Greg Roman was</p>
<p>Page 113</p> <p>1 misreading you, then forgive me.</p> <p>2 But you say that -- you give that</p> <p>3 answer in a way that makes me think that you are</p> <p>4 of the belief that Greg doing so, making those</p> <p>5 decisions without input from Daniel Pipes, was</p> <p>6 somehow wrong or improper.</p> <p>7 Am I correct on that?</p> <p>8 A. I'm just stating the facts.</p> <p>9 Q. Okay. So for all you know then,</p> <p>10 sitting here today, Greg Roman making those</p> <p>11 decisions without Daniel Pipe's input may have</p> <p>12 been entirely in accordance with Daniel Pipes'</p> <p>13 wishes?</p> <p>14 A. Not true. Because Daniel Pipes</p> <p>15 had written an e-mail and said to us that he did</p> <p>16 not know about our health insurance, that Greg</p> <p>17 was doing -- that Greg was paying half of it.</p> <p>18 And he wrote an e-mail to all</p> <p>19 staff saying that he was unaware of this. He</p> <p>20 does not believe that -- he doesn't believe in</p> <p>21 giving anybody benefits.</p> <p>22 He thinks we are all adults --</p> <p>23 these are his words. We are all adults. We can</p> <p>24 make our financial decisions on our own.</p>	<p>Page 115</p> <p>1 doing without Daniel Pipes' knowledge, major</p> <p>2 decisions, huge things.</p> <p>3 You've now named two that,</p> <p>4 according to you, based on what you heard from</p> <p>5 Daniel Pipes, you believe that Daniel Pipes was</p> <p>6 not aware of or disagreed with.</p> <p>7 Are there any other major</p> <p>8 decisions that are of the type that you're</p> <p>9 referencing that Greg made without the approval,</p> <p>10 authorization or input from Daniel Pipes?</p> <p>11 MR. CARSON: Object to form.</p> <p>12 THE DEPONENT: I mean, there were</p> <p>13 others. You know, getting rid of</p> <p>14 employees comes to mind.</p> <p>15 I can't give you specifics,</p> <p>16 because I don't remember all the details.</p> <p>17 But those were the two that I remember,</p> <p>18 like, because Daniel Pipes had such a</p> <p>19 negative reaction to it. Like they're</p> <p>20 the two that stick out in my mind.</p> <p>21 But, you know, like, I can't</p> <p>22 recall all of them honestly. There's so</p> <p>23 many.</p> <p>24 It's like how many times have I</p>

<p>1 eaten at McDonald's?  2 BY MR. CAVALIER:  3 Q. So --  4 A. I don't know. So many.  5 Q. Okay. So if I go back to the  6 chain of command of the hierarchy that we were  7 talking about before, from an organizational  8 standpoint, Daniel Pipes is the president of the  9 Middle East Forum, correct?  10 A. Correct.  11 Q. And regardless of what you  12 observed with respect to the decision-making  13 progress, Daniel Pipes was Greg Roman's boss,  14 correct?  15 A. Correct. Kind of.  16 Q. Greg Roman reported to Daniel  17 Pipes?  18 A. They were more like equals, but  19 yes.  20 Q. Can Greg Roman fire Daniel Pipes  21 if he wanted to?  22 A. No. You're right there. That's  23 fair.  24 Q. Could Daniel Pipes fire Greg Roman</p>	<p>Page 116</p>	<p>1 Goodrob.  2 I mean, there's a whole list of  3 people.  4 Q. Okay. So from your perspective,  5 those people you just named, the project  6 directors, they are -- they are your, for lack of  7 a better word, equals in the hierarchy at the  8 Middle East Forum?  9 A. No, they're not.  10 Q. Okay. Then I thought my question  11 to you was, tell me the people, other than you,  12 who are at that tier of the hierarchy at the  13 Middle East Forum?  14 A. I wasn't under that tier.  15 I was in a separate category all  16 of my own, as I described to you before. I was  17 Greg's assistant and so I reported -- and so this  18 was a reporting hierarchy.  19 Q. Okay.  20 A. So I was his assistant; therefore,  21 like -- like, the project directors have people  22 who report to them. Okay?  23 I didn't have anybody to report to  24 me. I was -- Greg Roman was my direct</p>	<p>Page 118</p>
<p>1 if he wanted to?  2 A. If he wanted to, he should have.  3 Q. Did he have that power?  4 A. Yes.  5 Q. So then they're not really equals,  6 correct?  7 A. That's fair. Yes.  8 Q. So below Daniel Pipes is Greg  9 Roman, correct?  10 A. Yes.  11 Q. Okay. Is there anyone else at  12 Greg Roman's level below Daniel Pipes on that  13 tier of the hierarchy?  14 A. No.  15 Q. Okay. So tell me the names of the  16 people who were below Greg Roman in the corporate  17 hierarchy at MEF while you were there?  18 A. Marnie Meyer, Mark Fink, Matthew  19 Bennett, Sam Westrout, Oren Litman -- Oren.  20 Who else? I'm trying to think of  21 everybody's name.  22 Winfield Meyers. I'm trying to  23 think of all the project directors. I mean,  24 there was a host of people. Thelma Prosser,</p>	<p>Page 117</p>	<p>1 supervisor, because I was his secretary. I was  2 his assistant.  3 Q. Okay.  4 A. So nobody was, like, -- I was in a  5 little category floating over there by myself.  6 Q. Okay. But you reported directly  7 to Greg, correct?  8 A. Correct. Because he was my boss.  9 Correct.  10 Q. And the project directors that you  11 just listed for me, they also reported to Greg?  12 A. Correct. But they could give me  13 work.  14 Q. Sure.  15 A. And, like, they assigned me things  16 and I was responsible to them, too.  17 So, like, -- so to say that, like,  18 if I did something wrong to, like, or whatever  19 with the project directors, then, you know, like,  20 they would have the ability to reprimand me. And  21 then take it to Greg or whomever to whatever,  22 like to implement disciplinary action.  23 So they were above me.  24 Q. Did you consider them your</p>	<p>Page 119</p>



<p>Page 120</p> <p>1 superiors?</p> <p>2 A. I didn't consider them my equals.</p> <p>3 Q. Did you consider them your</p> <p>4 superiors?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Was Marnie Meyer considered</p> <p>7 a project director?</p> <p>8 A. Oh, no. She was Human Resources</p> <p>9 and Chief Financial Officer.</p> <p>10 Q. Okay. And was she Director of</p> <p>11 Human Resources?</p> <p>12 A. Correct, yes.</p> <p>13 Q. So even though Human Resources</p> <p>14 isn't a project, so to speak, she was still, at</p> <p>15 least in your view, co-equal to the other project</p> <p>16 directors in the hierarchy?</p> <p>17 A. Correct. And she was above me.</p> <p>18 That's very much accurate, yeah.</p> <p>19 Q. Okay. Okay. Did you ever have</p> <p>20 anyone reporting to you during your time at the</p> <p>21 Middle East Forum?</p> <p>22 A. Not until later. And reporting is</p> <p>23 like -- yeah. So Delany Yoncheck, Marnie and I</p> <p>24 had, like, split her for some time. Like, you</p>	<p>Page 122</p> <p>1 do, right?</p> <p>2 A. Correct.</p> <p>3 Q. And if she did a poor job or</p> <p>4 refused to do them or what have you, did you have</p> <p>5 the authority to reprimand her?</p> <p>6 A. I only had the authority to tell</p> <p>7 Greg and then he would reprimand her.</p> <p>8 Q. Okay. And generally speaking, had</p> <p>9 you done so, would he take that instruction and</p> <p>10 act on it?</p> <p>11 A. I don't know what he would have</p> <p>12 done, because Delaney was a very good person. So</p> <p>13 I never had that thing. So I don't know.</p> <p>14 Q. Okay. Who else, other than --</p> <p>15 well, I'll ask the question this way.</p> <p>16 What was Delaney's role at the</p> <p>17 Forum when she was reporting -- I don't want to</p> <p>18 put words in your mouth.</p> <p>19 When Delaney was doing work for</p> <p>20 you, who -- what was her role?</p> <p>21 A. Well, we were always trying to</p> <p>22 kind of, like, figure that out, because she was</p> <p>23 doing checks and things for Marnie and she was</p> <p>24 helping with, like, the donation side of things.</p>
<p>Page 121</p> <p>1 know, Marnie would get her for some financial</p> <p>2 things. And I would -- she would do some</p> <p>3 communicationy things and website, like, tasks</p> <p>4 for us.</p> <p>5 And so, yeah, she reported to me</p> <p>6 so that, like, she didn't have to interact with</p> <p>7 Greg. But I wasn't technically her boss. Was</p> <p>8 just who was, like, somebody who was giving her</p> <p>9 guidance and using her, you know, -- using her</p> <p>10 work product to further whatever we were doing.</p> <p>11 Whatever directive, like, Greg needed.</p> <p>12 Greg would be, like, tell Delaney</p> <p>13 to do this and so I would tell Delaney to do</p> <p>14 that. I'm like the middleman.</p> <p>15 Q. Okay. So help me understand a</p> <p>16 little bit more about that relationship.</p> <p>17 You said you weren't like her</p> <p>18 boss.</p> <p>19 I mean, were you her superior</p> <p>20 within the organization?</p> <p>21 A. I guess I was -- yeah, like, if</p> <p>22 you look at things like seniority, I guess I'm</p> <p>23 higher than her.</p> <p>24 Q. And you could give her tasks to</p>	<p>Page 123</p> <p>1 And she was helping with the radio</p> <p>2 show and helping get articles placed and all that</p> <p>3 stuff.</p> <p>4 Q. Okay. Did she start as an intern?</p> <p>5 A. Yes, she did.</p> <p>6 Q. Was she ultimately hired for</p> <p>7 full-time work?</p> <p>8 A. I think that she got hired -- I</p> <p>9 don't really remember the specifics, but I think</p> <p>10 she got hired hourly.</p> <p>11 Q. Okay.</p> <p>12 A. I don't know if that's full-time,</p> <p>13 but hourly.</p> <p>14 Q. Okay. Fair enough.</p> <p>15 Is it fair to say that Delaney</p> <p>16 Yonchek was the lowest level of employee at the</p> <p>17 Middle East Forum?</p> <p>18 A. I guess, yeah.</p> <p>19 Q. She didn't have anybody reporting</p> <p>20 to her, correct?</p> <p>21 A. No, she did not.</p> <p>22 Q. Okay. Can you tell me the names</p> <p>23 of the other people at the Forum during your time</p> <p>24 there who were at Delaney's level, the lowest</p>

<p style="text-align: right;">Page 124</p> <p>1 level?</p> <p>2 A. I mean, it's, like, such a weird</p> <p>3 set up, because it's not really -- so it would be</p> <p>4 only really Katrina and Delaney, because, like,</p> <p>5 Thelma only reported to Daniel Pipes, but she</p> <p>6 didn't have the same authority as the project</p> <p>7 directors.</p> <p>8 Q. Okay.</p> <p>9 A. She didn't really report to anyone</p> <p>10 else.</p> <p>11 So, like, it's kind of like a</p> <p>12 strange thing. Like Judy Goodrob was, like, she</p> <p>13 does the Middle East Quarterly. And she doesn't</p> <p>14 really report to anybody but Daniel Pipes and</p> <p>15 Greg Roman.</p> <p>16 But, like, she doesn't -- but</p> <p>17 she's certainly not higher then, you know, --</p> <p>18 like she's not --</p> <p>19 Q. She's not equal to Marnie Myers,</p> <p>20 for example?</p> <p>21 A. Yeah. Yes. Yeah.</p> <p>22 Q. Even though she reports directly</p> <p>23 to Daniel Pipes?</p> <p>24 A. Right.</p>	<p style="text-align: right;">Page 126</p> <p>1 would mess up on things or she would do something</p> <p>2 silly or here or there.</p> <p>3 Delaney always tried hard, wanted</p> <p>4 to do the right thing, wanted to learn and be</p> <p>5 better. And she had great ideas sometimes.</p> <p>6 And there were times where she</p> <p>7 would -- she would read every single article and</p> <p>8 she was just really, like, devoted. Like she</p> <p>9 wanted to do a good job.</p> <p>10 Granted, it was her first job</p> <p>11 ever. So, of course, she's going to make</p> <p>12 mistakes and not be perfect. She was a good</p> <p>13 employee. She had a good heart. She was a good</p> <p>14 kid.</p> <p>15 Q. Okay. By the way, just to be</p> <p>16 clear, we're all talking about these reporting</p> <p>17 relationships.</p> <p>18 There's a distinction between who</p> <p>19 was reporting to Greg pre November 1, 2018, and</p> <p>20 post November 1, 2018, correct?</p> <p>21 A. We were all still reporting to</p> <p>22 Greg.</p> <p>23 Q. Well, tell me what you mean by</p> <p>24 that.</p>
<p style="text-align: right;">Page 125</p> <p>1 Q. Okay. So from what I gather from</p> <p>2 you, what you're telling me is the hierarchy at</p> <p>3 the Middle East Forum was not a neat, ordinary</p> <p>4 pyramid, with lines drawn from each level to the</p> <p>5 bottom.</p> <p>6 It was a little bit more</p> <p>7 scattered, so to speak, the reporting</p> <p>8 relationships?</p> <p>9 A. I guess.</p> <p>10 Q. Okay.</p> <p>11 A. I don't know. I don't know.</p> <p>12 Like, I don't know how to answer that. I don't</p> <p>13 know. I can't conceptualize it, so...</p> <p>14 Q. There's no right answer.</p> <p>15 Again, I'm just --</p> <p>16 A. I'm not trying to give you a right</p> <p>17 answer. Like, I guess.</p> <p>18 Q. Okay. You said Delaney was a good</p> <p>19 employee?</p> <p>20 A. Yes.</p> <p>21 Q. What are -- so give me a sense of</p> <p>22 that. Why was she a good employee?</p> <p>23 A. There was things that Delaney did</p> <p>24 as a young thing that were, like, you know, she</p>	<p style="text-align: right;">Page 127</p> <p>1 A. So, for example, I was told that I</p> <p>2 wasn't to have communication with Greg and he</p> <p>3 wasn't my direct supervisor; however, I was</p> <p>4 mandated to be on these project directors calls</p> <p>5 where he would assign me tasks and, you know,</p> <p>6 still have to communicate with me. And</p> <p>7 everything really still flowed through Greg.</p> <p>8 There was a point where I even</p> <p>9 called Daniel Pipes and I said, the staff is</p> <p>10 concerned. I remember where I was standing. I</p> <p>11 was standing by that white marble thing in the</p> <p>12 lobby. And I was talking to Daniel Pipes on the</p> <p>13 phone.</p> <p>14 I said, the staff is concerned</p> <p>15 that you're still making all your decisions and</p> <p>16 Greg's still running the show.</p> <p>17 And he admitted on the phone that,</p> <p>18 yes, I still take advice from Greg. I trust and</p> <p>19 value his opinions and we need Greg.</p> <p>20 I mean, he was always there and</p> <p>21 involved and Daniel -- Daniel admitted that to</p> <p>22 me.</p> <p>23 Q. Well, of course. I mean, he was</p> <p>24 still an employee of the Forum, correct?</p>

<p style="text-align: right;">Page 128</p> <p>1 A. No, it was more than that.</p> <p>2 Like -- it was more than that.</p> <p>3 He was able to give directives and</p> <p>4 if those directives were not followed through or</p> <p>5 people complained about those directives or</p> <p>6 anything like that, it would not be Greg that was</p> <p>7 in trouble for us. It would always be us getting</p> <p>8 in trouble, because Greg gave us directives, even</p> <p>9 though he wasn't supposed to be supervising us.</p> <p>10 Q. Was he giving them to you</p> <p>11 directly?</p> <p>12 A. Yes.</p> <p>13 Q. How?</p> <p>14 A. On the project directors' calls,</p> <p>15 over e-mail.</p> <p>16 Q. Did you consider yourself to be</p> <p>17 reporting to Greg during this time?</p> <p>18 A. I mean, for all intents and</p> <p>19 purposes, Daniel -- like, there was plenty of</p> <p>20 times where I started reporting to Daniel Pipes</p> <p>21 for sure.</p> <p>22 But I was still actually actively</p> <p>23 reporting to Greg Roman as well. I mean, he</p> <p>24 would say, Lisa, what's going on with the radio</p>	<p style="text-align: right;">Page 130</p> <p>1 terrible human.</p> <p>2 And he continued to harass -- he</p> <p>3 tried to get me fired on things. He would say,</p> <p>4 Daniel Pipes, this isn't happening, blah, blah,</p> <p>5 blah.</p> <p>6 And then like on a -- we would</p> <p>7 discuss one.</p> <p>8 Here's the example. We would</p> <p>9 discuss something on the project directors' call,</p> <p>10 one of them was why the IW articles or</p> <p>11 newsletters or something weren't going out. I</p> <p>12 don't remember what the specific thing was. But</p> <p>13 it was with IW.</p> <p>14 And so I said -- and so Greg's,</p> <p>15 like, yeah, it's fine, blah, blah, blah, blah.</p> <p>16 We'll make whatever decision.</p> <p>17 And then Daniel Pipes was not on</p> <p>18 that phone call. And I had been on the phone</p> <p>19 with Sam right afterwards, who runs IW.</p> <p>20 And so then I get an e-mail from</p> <p>21 Daniel Pipes saying, how come the IW articles</p> <p>22 haven't gone out, blah, blah, blah, since you</p> <p>23 started, like, being in charge of putting them</p> <p>24 out.</p>
<p style="text-align: right;">Page 129</p> <p>1 show and blah, blah, blah. And like give me</p> <p>2 directives.</p> <p>3 Or, Lisa, I need to you do this.</p> <p>4 Or, Lisa, how come the IW articles aren't going</p> <p>5 out. Whatever.</p> <p>6 And it turns out, he was trying to</p> <p>7 trap me in that. And he gave a directive three</p> <p>8 months before that they weren't to go out.</p> <p>9 So, yes, he was still very much</p> <p>10 actively involved and actively supervising.</p> <p>11 Q. Did you have a problem with that?</p> <p>12 A. Yes.</p> <p>13 Q. Why?</p> <p>14 A. Because -- because Greg would, you</p> <p>15 know, continue his -- the same harassing, awful</p> <p>16 behavior.</p> <p>17 Like I just gave you an example.</p> <p>18 He was completely retaliatory and disgusting.</p> <p>19 And even then, like, I had to go to a radio show</p> <p>20 with him, right?</p> <p>21 And he called us all usurpers. Or</p> <p>22 used the usurper thing, gave like this eye. And</p> <p>23 then he would still look me and be gross with me</p> <p>24 whenever I did see him. He's gross. He's a</p>	<p style="text-align: right;">Page 131</p> <p>1 And I said, it was -- and so I</p> <p>2 said, nobody did it before me. Four people have</p> <p>3 done this before me, never did, blah, blah, blah.</p> <p>4 So I went to the person who got</p> <p>5 rehired, that who was in the office who did that.</p> <p>6 And he pulled up the e-mail and said, no, three</p> <p>7 months ago they said we're not doing this</p> <p>8 anymore.</p> <p>9 So Greg -- and he was, like, --</p> <p>10 and Daniel and Greg were both on the e-mail</p> <p>11 thread.</p> <p>12 And so when Daniel pressured me on</p> <p>13 it, I said, it's on the e-mail thread that we</p> <p>14 weren't doing this. The whole thing was Greg is</p> <p>15 doing this retaliation.</p> <p>16 He knew that Daniel wouldn't</p> <p>17 remember. And so he's like, Lisa's not doing her</p> <p>18 job, to get me fired -- even though that there</p> <p>19 was a directive not to -- there was a directive</p> <p>20 not to do what he was accusing me of doing.</p> <p>21 And Daniel Pipes wouldn't have</p> <p>22 known about that. He said Greg came to him and</p> <p>23 said, it's come to -- Greg brought to my</p> <p>24 attention that you're not putting out the IW</p>

<p>1 articles.</p> <p>2 And I was, like, there was a</p> <p>3 directive from three months ago for us not to.</p> <p>4 And then Daniel Pipes left it alone and never</p> <p>5 contacted me about it again, because he knew that</p> <p>6 that was true.</p> <p>7 So, yes, Greg Roman was still</p> <p>8 making decisions. Still trying to get me fired.</p> <p>9 Still leering at me when he did see me. He was</p> <p>10 still always inappropriate.</p> <p>11 Q. You told me earlier that in your</p> <p>12 view, Greg Roman was the one really in charge in</p> <p>13 the Forum, correct?</p> <p>14 A. Correct. There's a perfect</p> <p>15 example of that.</p> <p>16 Q. If he wanted you fired, couldn't</p> <p>17 he have just fired you?</p> <p>18 MR. CARSON: Object to form.</p> <p>19 THE DEPONENT: I don't know what</p> <p>20 Greg Roman's motives were for not firing</p> <p>21 me but there has to be cause and I was a</p> <p>22 very good employee.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. What do you mean there has to be</p>	<p>Page 132</p> <p>1 To the extent you know the answer,</p> <p>2 you can answer the question.</p> <p>3 THE DEPONENT: Listen, I am not --</p> <p>4 I'm not gonna hear, like, take -- presume</p> <p>5 Greg -- Greg Roman's, you know, reasons</p> <p>6 for not firing me or firing me.</p> <p>7 I do know that he engaged in</p> <p>8 retaliatory behavior to me non-stop and I</p> <p>9 know this because I experienced it.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. Is every instance of disagreement</p> <p>12 that you've had with Greg Roman post November 1,</p> <p>13 2018, an instance of retaliation?</p> <p>14 MR. CARSON: I'm gonna object to</p> <p>15 the extent that that question is</p> <p>16 argumentative and it's also misstating</p> <p>17 prior testimony.</p> <p>18 Do you really want her to answer</p> <p>19 that question? Do you want to rephrase</p> <p>20 it?</p> <p>21 MR. CAVALIER: I'd like -- if you</p> <p>22 could answer, I'd like to hear your</p> <p>23 answer.</p> <p>24 MR. CARSON: I think the question</p>
<p>1 cause?</p> <p>2 MR. CARSON: I'm just gonna</p> <p>3 object. It calls for a legal conclusion,</p> <p>4 speculation. It's hypothetical.</p> <p>5 Objection. You can answer.</p> <p>6 THE DEPONENT: What would he fire</p> <p>7 me for if I'm good at my job? There's</p> <p>8 never been a performance issue. What</p> <p>9 would be the grounds for firing me?</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. In Pennsylvania, you don't need</p> <p>12 grounds for firing somebody. You can fire</p> <p>13 somebody if you don't like the color of the tie</p> <p>14 they're wearing.</p> <p>15 MR. CARSON: Objection.</p> <p>16 THE DEPONENT: Again --</p> <p>17 MR. CARSON: Wait. Wait. Wait.</p> <p>18 THE DEPONENT: Go ahead, Seth.</p> <p>19 Sorry.</p> <p>20 MR. CARSON: I'm gonna object</p> <p>21 based on form.</p> <p>22 It calls for a legal conclusion</p> <p>23 to what is and what is not an employee at</p> <p>24 will and the exceptions to that.</p>	<p>Page 133</p> <p>1 is, is every time you disagreed with Greg</p> <p>2 Roman an example of harassment or</p> <p>3 retaliation?</p> <p>4 THE DEPONENT: Of course not. But</p> <p>5 this isn't the case of disagreements.</p> <p>6 He can say, hey, I don't think</p> <p>7 that this should be worded that way and</p> <p>8 that's fine. That's not what he was</p> <p>9 doing.</p> <p>10 He was engaged in a campaign of</p> <p>11 putting me -- like I said, in this</p> <p>12 particular example, with the project</p> <p>13 directors' call, on the call everything</p> <p>14 was fine. We had the conversation.</p> <p>15 Then he went to Daniel, said</p> <p>16 something different. Didn't give him all</p> <p>17 the information and with the intention of</p> <p>18 making me look bad.</p> <p>19 And then when I had the evidence</p> <p>20 to back it up, Daniel Pipes let it go.</p> <p>21 That is an instance of</p> <p>22 retaliation.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Well, you said Daniel Pipes let it</p>
<p>Page 134</p>	<p>Page 135</p>



<p>Page 136</p> <p>1 go. I mean, he agreed with you that you didn't</p> <p>2 do anything wrong, correct?</p> <p>3 MR. CARSON: I'm gonna object.</p> <p>4 Argumentative.</p> <p>5 THE DEPONENT: Actually, I don't</p> <p>6 know what he agreed to or didn't agree</p> <p>7 to, because after I wrote that, he never</p> <p>8 responded to me at all.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. But the issue went away, right?</p> <p>11 You weren't disciplined or anything?</p> <p>12 MR. CARSON: Objection. You can</p> <p>13 answer.</p> <p>14 THE DEPONENT: What are you gonna</p> <p>15 discipline me for if there's proof that I</p> <p>16 didn't do anything wrong?</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Well, so I agree with you.</p> <p>19 But it sounds like you had a</p> <p>20 disagreement with Greg Roman. You brought the</p> <p>21 evidence to his boss and the issue went away.</p> <p>22 MR. CARSON: Object to form.</p> <p>23 Argumentative. Assuming facts not in</p> <p>24 evidence. Misstating prior testimony.</p>	<p>Page 138</p> <p>1 answer that question.</p> <p>2 THE DEPONENT: Yes.</p> <p>3 MR. CARSON: Was Greg doing that</p> <p>4 to get you fired?</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Okay. But you weren't fired?</p> <p>7 A. (No audible response.)</p> <p>8 MR. CARSON: We can't hear you,</p> <p>9 Lisa. Say that again.</p> <p>10 THE DEPONENT: Yes.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. You weren't fired for this,</p> <p>13 correct?</p> <p>14 MR. CARSON: Or were you fired?</p> <p>15 THE DEPONENT: I was not fired.</p> <p>16 Actually, kind of.</p> <p>17 I, mean they gave me -- the</p> <p>18 conditions were so terrible and so long,</p> <p>19 I, like, had to quit. I didn't want to</p> <p>20 quit.</p> <p>21 I loved the mission. I'm a</p> <p>22 mission-oriented person. It was in</p> <p>23 Philly. It was near my kids.</p> <p>24 I didn't want to have to go find a</p>
<p>Page 137</p> <p>1 You can answer.</p> <p>2 THE DEPONENT: That's what I was</p> <p>3 just saying. You mischaracterized what I</p> <p>4 said. It was not a disagreement.</p> <p>5 It was, was this being done, how</p> <p>6 comes it wasn't being done. Sam said,</p> <p>7 we're not going to do this. We decided</p> <p>8 we're not gonna do this.</p> <p>9 Then he went and said something</p> <p>10 completely different to Daniel Pipes.</p> <p>11 There was not a disagreement. We didn't</p> <p>12 disagree about anything. If he wanted me</p> <p>13 to put the articles out, I would have put</p> <p>14 the articles out. That's not what</p> <p>15 happened.</p> <p>16 You mischaracterized that whole</p> <p>17 story.</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. Well, I understand all of that.</p> <p>20 But your testimony was that you</p> <p>21 thought Greg was doing that to try to get you</p> <p>22 fired.</p> <p>23 Correct?</p> <p>24 MR. CARSON: Go ahead. You can</p>	<p>Page 139</p> <p>1 new job. Do you know how hard it is for</p> <p>2 conservative people to find a</p> <p>3 conservative job in Philadelphia? Like</p> <p>4 almost impossible. I didn't want to</p> <p>5 quit, I had to, because they were so</p> <p>6 freaking awful.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. We're talking about the issue</p> <p>9 about the radio show here.</p> <p>10 A. This was ongoing. This happened</p> <p>11 all the time. And it wasn't about the radio</p> <p>12 show. You just mischaracterized it again. It</p> <p>13 was about the IW articles.</p> <p>14 Q. Okay. So let's talk about the IW</p> <p>15 articles. You brought it to Daniel Pipes's</p> <p>16 attention.</p> <p>17 You thought Greg was doing it,</p> <p>18 because he was trying to get you fired, correct?</p> <p>19 A. Correct.</p> <p>20 Q. But you were not fired for that,</p> <p>21 correct?</p> <p>22 MR. CARSON: Objection. Asked and</p> <p>23 answered. Go ahead.</p> <p>24 THE DEPONENT: Correct.</p>

<p>Page 140</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. So the issue was then resolved</p> <p>3 favorably from your perspective, correct?</p> <p>4 MR. CARSON: Objection.</p> <p>5 THE DEPONENT: You're</p> <p>6 mischaracterizing what I'm saying.</p> <p>7 Trying to get someone fired and it not</p> <p>8 happening is still harassment.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. I'm not talking about harassment.</p> <p>11 A. Well, what are you talking about?</p> <p>12 Q. I'm just asking you whether the</p> <p>13 issue was resolved favorably to you.</p> <p>14 A. It wasn't resolved because nobody</p> <p>15 addressed it. Daniel Pipes didn't say, oh, I'm</p> <p>16 sorry, Lisa, that, like, -- you know, I got poor</p> <p>17 information. He just ignored me like I was</p> <p>18 nothing. That's how he treated everyone.</p> <p>19 MR. CARSON: I also didn't say</p> <p>20 objection. Argumentative.</p> <p>21 THE DEPONENT: Sorry, Seth.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. How do you know he just ignored</p> <p>24 you? How do you know what he did?</p>	<p>Page 142</p> <p>1 mischaracterizing it.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. I'm not mischaracterizing anything</p> <p>4 you just told me. I'm asking you a general</p> <p>5 question.</p> <p>6 MR. CARSON: So I'm gonna object</p> <p>7 based on form, hypothetical.</p> <p>8 You can answer whether or not in</p> <p>9 any normal employee/employer relationship</p> <p>10 there with be disagreements.</p> <p>11 THE DEPONENT: Yes. There are --</p> <p>12 hypothetically or whatever you guys want</p> <p>13 to say, there can be -- there's often</p> <p>14 disagreements between employees and</p> <p>15 employers, yes.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Do you think Greg -- do you think</p> <p>18 Greg Roman was a difficult boss?</p> <p>19 A. I think Greg was a terrible boss.</p> <p>20 Q. Okay. So with that said, can you</p> <p>21 give me one instance where you had a disagreement</p> <p>22 over work with Greg that you would not categorize</p> <p>23 as harassment or retaliation?</p> <p>24 A. There's plenty. We disagreed</p>
<p>Page 141</p> <p>1 A. Because he ignored me. He never</p> <p>2 brought it up again.</p> <p>3 Q. How do you know he didn't bring it</p> <p>4 up to other people and solve the problem?</p> <p>5 A. He ignored me.</p> <p>6 Then he should have said to me as</p> <p>7 a good leader, Lisa, I am sorry that this was</p> <p>8 brought to my attention in this way. You are</p> <p>9 correct. And I'll resolve it.</p> <p>10 That's what a normal manager does.</p> <p>11 But they don't think that of you.</p> <p>12 Like women there are beneath them</p> <p>13 and so they don't need to give you any</p> <p>14 explanation. They don't need to let you know</p> <p>15 that it's been taken care of.</p> <p>16 And I said to him, I said, he's</p> <p>17 lying about me. And -- or what's gonna happen</p> <p>18 about that? And Daniel Pipes never responded.</p> <p>19 Never responded.</p> <p>20 Q. Do you agree with me that in a</p> <p>21 typical employee/employer relationship there are</p> <p>22 disagreements between employers and supervisors?</p> <p>23 MR. CARSON: Objection.</p> <p>24 THE DEPONENT: You are</p>	<p>Page 143</p> <p>1 on -- okay. So there was -- Greg and Daniel had</p> <p>2 wanted Tommy Robinson to come over in November.</p> <p>3 I think it was 2018 or '19. I think it was '19.</p> <p>4 No, '18. '18. 2018.</p> <p>5 November 2018 they wanted Tommy</p> <p>6 Robinson to come over and do a panel at Congress</p> <p>7 and they asked me to help with his Visa.</p> <p>8 And I had requested that Greg keep</p> <p>9 it under wraps so that we -- so that we wouldn't</p> <p>10 publicize it while I'm working on the back end to</p> <p>11 try to, like, work the back channels to help with</p> <p>12 this Visa application, you know, that -- that it</p> <p>13 not be public, because then both governments</p> <p>14 would get pressure from external people.</p> <p>15 And we had a disagreement about</p> <p>16 that. And he decided to put the press release</p> <p>17 out anyway, that we were working on this Visa and</p> <p>18 that Tommy Robinson was supposed to come to this</p> <p>19 event in November.</p> <p>20 We disagreed on that. That wasn't</p> <p>21 retaliation. That was structure. That was what,</p> <p>22 he, as the director, wanted to do. That wasn't</p> <p>23 retaliation. That was a different way of --</p> <p>24 that's a disagreement, a different way of wanting</p>

<p>1 it to happen.</p> <p>2 Q. Okay. So what makes one -- let's</p> <p>3 just talk specifically about the issue you just</p> <p>4 described for me and the issue we just talked</p> <p>5 about a few minutes ago.</p> <p>6 Okay?</p> <p>7 MR. CARSON: So is there a</p> <p>8 question?</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. Yeah.</p> <p>11 The question is, what makes one</p> <p>12 retaliation and harassment and one not?</p> <p>13 MR. CARSON: I'm gonna object to</p> <p>14 the form of the question. Calls for a</p> <p>15 legal conclusion.</p> <p>16 To the extent you understand what</p> <p>17 the legal definition of harassment and</p> <p>18 retaliation is, you can answer.</p> <p>19 THE DEPONENT: One, it's having a</p> <p>20 disagreement. And two is reporting</p> <p>21 untruths to me to the president of the</p> <p>22 organization, untruths about my work.</p> <p>23 That's the difference.</p> <p>24</p>	<p>Page 144</p> <p>1 Q. And these two events, based on</p> <p>2 what you told me, happened around the same time</p> <p>3 as one another?</p> <p>4 A. No.</p> <p>5 Q. I thought you told me that the --</p> <p>6 A. November 2018 was the Tommy</p> <p>7 Robinson thing. And I think -- I can't remember</p> <p>8 exactly, but it was sometime before Greg Roman</p> <p>9 came back, you know, like -- not came back, but,</p> <p>10 like, was allowed to have his official title of</p> <p>11 director, although nothing changed before then.</p> <p>12 So I would say it was probably</p> <p>13 between January -- because I didn't start doing</p> <p>14 the output of those articles until January.</p> <p>15 So it had to be between January</p> <p>16 and March or April.</p> <p>17 Q. Okay. Did it upset that he lied</p> <p>18 to Daniel Pipes about you?</p> <p>19 MR. CARSON: Objection. You can</p> <p>20 answer.</p> <p>21 THE DEPONENT: Yes.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. Did you think about quitting?</p> <p>24 MR. CARSON: Objection. You can</p>
<p>Page 145</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Okay. So the fact that he told</p> <p>3 Daniel something you believe is untrue about your</p> <p>4 work makes -- makes --</p> <p>5 A. Not that I believe it was untrue.</p> <p>6 It was untrue.</p> <p>7 Q. I understand that. But that's the</p> <p>8 distinction. That's what makes it retaliation</p> <p>9 from your --</p> <p>10 MR. CARSON: Objection. Again, it</p> <p>11 calls for a legal conclusion to the</p> <p>12 extent she understands the legal</p> <p>13 definition of retaliation.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. You can answer.</p> <p>16 A. That is the difference. He lied</p> <p>17 about me.</p> <p>18 What intention -- what intention</p> <p>19 did he have to lie about me to his boss, when he</p> <p>20 clearly understood the whole thing, because we</p> <p>21 had talked about it earlier that day on the</p> <p>22 project directors' call?</p> <p>23 What was the purpose of lying</p> <p>24 about it to Daniel Pipes?</p>	<p>Page 147</p> <p>1 answer.</p> <p>2 THE DEPONENT: I thought about</p> <p>3 quitting multiple times over the course</p> <p>4 of working at the Middle East Forum.</p> <p>5 However, the reason that I stayed</p> <p>6 was because, like I said, there are not</p> <p>7 very many job opportunities for</p> <p>8 conservative people in Philadelphia.</p> <p>9 It was close to my family. Close</p> <p>10 to my children.</p> <p>11 And now that I was forced to</p> <p>12 leave, I have -- I live two-and-a-half</p> <p>13 hours away from my children so that I</p> <p>14 could get a job here, so that I could</p> <p>15 work.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Did you tell Daniel Pipes that you</p> <p>18 believe that Greg's actions in this respect were</p> <p>19 retaliation?</p> <p>20 A. Yes.</p> <p>21 Q. Did you tell Daniel Pipes that you</p> <p>22 believed that his actions were retaliation that</p> <p>23 was a result of the complaints that you lodged</p> <p>24 against him in November of 2018?</p>

<p style="text-align: right;">Page 148</p> <p>1 A. I told Daniel Pipes on multiple</p> <p>2 occasions that I believed that Greg to be</p> <p>3 retaliating against me and he never responded.</p> <p>4 Q. Other than this incident that</p> <p>5 we're discussing, were there any other instances</p> <p>6 of retaliation that Greg Roman directed toward</p> <p>7 you between November of 2018 and May of 2019?</p> <p>8 A. Yes, there were so, so many.</p> <p>9 MR. CARSON: Same objection as</p> <p>10 before. Calls for a legal conclusion.</p> <p>11 You can answer.</p> <p>12 THE DEPONENT: There's so much.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Tell me about them.</p> <p>15 A. I mean, I'll be here all day.</p> <p>16 We'll be here into next week if I</p> <p>17 could, you know, clearly remember the specifics</p> <p>18 of all of them. I'm trying to remember another</p> <p>19 one.</p> <p>20 But I had written to Daniel on</p> <p>21 multiple occasions about it via e-mail.</p> <p>22 I remember one time, and I don't</p> <p>23 remember the cause of it, but I said to him, I</p> <p>24 feel like that you guys are trying to, you know,</p>	<p style="text-align: right;">Page 150</p> <p>1 that there were many more, because I</p> <p>2 remember writing e-mails. I just don't</p> <p>3 remember the specifics of exactly what</p> <p>4 they were. Honestly, I don't.</p> <p>5 I remember writing multiple</p> <p>6 e-mails to Daniel in that time period and</p> <p>7 I don't remember the specifics.</p> <p>8 If I had copies of the e-mails in</p> <p>9 front of me, I'm sure it would jog my</p> <p>10 memory.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Is there anything else as we sit</p> <p>13 here right now that stands out in your head as</p> <p>14 being as of a severe level as that other incident</p> <p>15 that we talked about?</p> <p>16 MR. CARSON: Objection. Wait.</p> <p>17 Wait. Object to form.</p> <p>18 THE DEPONENT: I actually remember</p> <p>19 there being a worse one than that and for</p> <p>20 some reason, like, it's escaping me now.</p> <p>21 I don't know why I can't remember.</p> <p>22 But there was one that was worse</p> <p>23 and I was, like, I cannot believe this is</p> <p>24 happening.</p>
<p style="text-align: right;">Page 149</p> <p>1 like, -- like have a list of things that you can</p> <p>2 put on to, like, fire me about and none of them</p> <p>3 are true. And I keep coming back to you and</p> <p>4 telling you that, like, they aren't true. And I</p> <p>5 prove it. And then I don't hear anything.</p> <p>6 And he didn't respond to that</p> <p>7 either. I mean, I went to Daniel, like, a bunch</p> <p>8 of times. Nothing ever happened.</p> <p>9 Q. I understand you're saying you</p> <p>10 went to Daniel a bunch of times.</p> <p>11 My question to you is, you talked</p> <p>12 about one instance where Greg, according to you,</p> <p>13 gave Daniel incorrect or false information about</p> <p>14 you in your view in order to retaliate against</p> <p>15 you and try to get you fired.</p> <p>16 A. Correct.</p> <p>17 Q. Okay. Can you tell me about</p> <p>18 another incident that occurred during this same</p> <p>19 time window, between November of 2018 and May</p> <p>20 2019, that Greg was retaliating against you?</p> <p>21 MR. CARSON: Objection to the</p> <p>22 extent it calls for a legal conclusion.</p> <p>23 You can answer.</p> <p>24 THE DEPONENT: Yeah, I believe</p>	<p style="text-align: right;">Page 151</p> <p>1 And I, for the life of me --</p> <p>2 listen -- and I remember being, like,</p> <p>3 angered by it. And I don't remember -- I</p> <p>4 can't tell you right now for some reason.</p> <p>5 Maybe it will come to me in a</p> <p>6 couple minutes. You know how you, like,</p> <p>7 forget stuff like that once in a while?</p> <p>8 There is one that I remember is</p> <p>9 worse and I'm trying to remember what it</p> <p>10 was.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. That's fair. And if you think of</p> <p>13 it, I'd ask you to let me know and we can talk</p> <p>14 about it.</p> <p>15 A. Yeah, if it comes in, I'll be,</p> <p>16 like, oh, yeah, I remember. I promise.</p> <p>17 Again, there was another one that</p> <p>18 I remember being worse than that one. I don't</p> <p>19 know if that one is the one that's coming into my</p> <p>20 head.</p> <p>21 Q. Do you remember whether there were</p> <p>22 disagreements that you had with Greg during this</p> <p>23 same time period that you would not consider to</p> <p>24 be retaliation, other than the one that we</p>



<p>1 discussed before?</p> <p>2 MR. CARSON: Objection to the</p> <p>3 extent that, like the previous question,</p> <p>4 calls for a legal conclusion.</p> <p>5 If you understand what retaliation</p> <p>6 is, you can answer.</p> <p>7 THE DEPONENT: I believe so. I</p> <p>8 mean, like, you know, we would -- I would</p> <p>9 write drafts of things that would go out</p> <p>10 and then Greg would correct them. I</p> <p>11 wouldn't totally love it. I'd write</p> <p>12 back. Like those types of things. And</p> <p>13 they're normal.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Okay. How would you describe</p> <p>16 generally your job -- well, strike that.</p> <p>17 How were you feeling in general</p> <p>18 about your job at MEF during this time period?</p> <p>19 A. You know, it's hard to have</p> <p>20 confidence in your job when people keep lying</p> <p>21 about your performance. And, you know, you start</p> <p>22 to feel really negative about, you know, being</p> <p>23 good at something when every thing is a freaking</p> <p>24 uphill battle.</p>	<p>Page 152</p> <p>1 gave her a position that they knew she couldn't</p> <p>2 do, so that she would go herself. And they were</p> <p>3 doing the same thing to me.</p> <p>4 And I expressed that to Daniel</p> <p>5 Pipes. And he said to me, he goes, well, I knew</p> <p>6 about that situation with Ahman and that's not</p> <p>7 what we're doing to you. I signed off on doing</p> <p>8 that to Ahman.</p> <p>9 But why would you admit to</p> <p>10 somebody that that's what you're doing to them?</p> <p>11 And really that's what it felt like.</p> <p>12 They knew I didn't -- there was</p> <p>13 one point where, you know, where Greg was telling</p> <p>14 me -- I mean, this was right away, this was in</p> <p>15 January, that I should take a coding class and I</p> <p>16 needed to do this and this. And he would</p> <p>17 instruct me on what to do on the back end of the</p> <p>18 website. Sometimes it would be right and</p> <p>19 sometimes it would be wrong.</p> <p>20 Daniel Pipes would say, well, why</p> <p>21 did this format look like this? I'm like, that's</p> <p>22 how Greg told me to do it. And then, you know,</p> <p>23 Greg would change his mind -- or change his mind</p> <p>24 or maybe he wasn't telling me directly.</p> <p>Page 154</p>
<p>1 And, you know, they put me --</p> <p>2 because they didn't want me, quote, being Greg's</p> <p>3 assistant, they put me into a position, like,</p> <p>4 there's nothing really here else for you to do.</p> <p>5 So if Greg's not gonna be the,</p> <p>6 quote, director and you can't report to him,</p> <p>7 we're either going to have to let you go or we're</p> <p>8 going to have to make you do something we have a</p> <p>9 need for, which was, you know, back end of the</p> <p>10 website.</p> <p>11 I mean, I am not a technical</p> <p>12 person. I don't have experience in coding. I</p> <p>13 don't have experience on posting to back ends of</p> <p>14 websites -- or I didn't at the time.</p> <p>15 And so it made me feel -- it made</p> <p>16 me feel, like, not great, you know. And I pride</p> <p>17 myself on being a really good employee. But I</p> <p>18 was learning as I go. And I was trying my</p> <p>19 hardest. But, you know, but the expectations</p> <p>20 versus reality.</p> <p>21 And it's the same thing that</p> <p>22 Daniel Pipes had said to me with Ahman. They</p> <p>23 gave her -- they said, Ahman Patel -- and Daniel</p> <p>24 Pipes said this to myself directly -- that they</p> <p>Page 153</p>	<p>1 Like, they were purposefully</p> <p>2 trying to set me up for a job that I couldn't do.</p> <p>3 Of course it made me feel terrible.</p> <p>4 Q. Okay. You just said earlier they</p> <p>5 said to you that, you know, if Greg wasn't around</p> <p>6 and you were Greg's assistant and there was</p> <p>7 nothing else you could do, they would have to let</p> <p>8 you go. Right? That's what you said?</p> <p>9 A. Well, because they didn't want to</p> <p>10 fire me -- he said this. He said, I don't want</p> <p>11 to fire you because you complained about Greg.</p> <p>12 Q. But couldn't they have just easily</p> <p>13 fired you by saying, Greg's not around anymore,</p> <p>14 sorry, you're Greg's assistant, you don't have a</p> <p>15 job?</p> <p>16 MR. CARSON: Objection.</p> <p>17 Argumentative.</p> <p>18 You can answer.</p> <p>19 THE DEPONENT: Daniel Pipes said</p> <p>20 to me, you reported -- you reported Greg</p> <p>21 Roman for sexual harassment. We can't</p> <p>22 just fire you.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Hold on a second. Hold on a</p> <p>Page 155</p>

<p>1 second.</p> <p>2 Your testimony is that Daniel</p> <p>3 Pipes said to you, you complained about Greg</p> <p>4 Roman for sexual harassment, we can't just fire</p> <p>5 you?</p> <p>6 A. In other words, yeah. I don't</p> <p>7 remember what they were, but that was the intent</p> <p>8 of his statement, yeah.</p> <p>9 And it was, like -- it was, like,</p> <p>10 when we were trying to figure out a job for me.</p> <p>11 Q. Are you layering your</p> <p>12 interpretation onto what Daniel Pipes actually</p> <p>13 said to you there?</p> <p>14 A. I don't know what that means.</p> <p>15 MR. CARSON: Objection.</p> <p>16 Argumentative.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Do you remember what Daniel Pipes</p> <p>19 actually said to you at that point in time?</p> <p>20 A. It was along those lines. I don't</p> <p>21 remember verbatim.</p> <p>22 But we were trying to figure out</p> <p>23 what to do and I said to him, I don't know how to</p> <p>24 do this. And then Greg said, Lisa seems</p>	<p>Page 156</p> <p>1 not. And if you're not, you know, willing -- of</p> <p>2 course I was willing to be a hundred percent on</p> <p>3 it. But, like, it's something brand new to me.</p> <p>4 And this was a repeated pattern.</p> <p>5 Like this is all the time.</p> <p>6 And, like, that's another example</p> <p>7 of him trying to get me fired.</p> <p>8 Like, you know, -- he took what I</p> <p>9 said, it's all Greek to me out of context and</p> <p>10 then reported to Daniel that I was being -- what</p> <p>11 do you call it? I was being, like, insubordinate</p> <p>12 or I was being, like, not a team player. He was</p> <p>13 using it in negative connotation when it was like</p> <p>14 I'm gonna wait for the people to train me.</p> <p>15 Because, A, I didn't want to also</p> <p>16 have interaction with Greg Roman when I was told</p> <p>17 I wouldn't have to.</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. Okay. Well, I'm gonna come back</p> <p>20 to that.</p> <p>21 But you just said -- you just said</p> <p>22 that you were told you wouldn't have to have</p> <p>23 interaction with Greg Roman, because you didn't</p> <p>24 want to.</p> <p>Page 158</p>
<p>1 resistant because in one text I said to him -- we</p> <p>2 were trying to figure out what for me -- like to</p> <p>3 do -- like what there was for me to do. And this</p> <p>4 was right -- this was, like, in January. Right</p> <p>5 after, like, Greg was removed.</p> <p>6 And they decided to do the back</p> <p>7 end of the website. Well, Greg had to teach me</p> <p>8 the back end of the website.</p> <p>9 And I remember him being, like,</p> <p>10 very argumentative to me. And maybe I should</p> <p>11 take a computer class in my own time.</p> <p>12 And then I said, Greg, I don't</p> <p>13 know. This is all Greek to me. I'm just gonna</p> <p>14 wait for the instructional stuff from whoever I</p> <p>15 was taking the training with.</p> <p>16 And then -- and then he reported</p> <p>17 to Daniel, because I said that it was all Greek</p> <p>18 to me. My husband's Greek, right?</p> <p>19 But it's, like, all Greek to me.</p> <p>20 That I was going to wait for that, that I -- he</p> <p>21 didn't think that I was -- he told Daniel I</p> <p>22 wasn't fully invested in this transition.</p> <p>23 And Daniel wrote me a reprimanding</p> <p>24 e-mail, like, are you? Because Greg says you're</p>	<p>Page 157</p> <p>1 It's true, though, that you then</p> <p>2 truly thereafter asked for him to be brought</p> <p>3 back, correct?</p> <p>4 MR. CARSON: Objection. You can</p> <p>5 answer.</p> <p>6 THE DEPONENT: I asked for Greg</p> <p>7 Roman to come back months later. And the</p> <p>8 reason that I asked for Greg Roman to</p> <p>9 come back is because Daniel Pipes was</p> <p>10 floundering with -- he's not an</p> <p>11 administrative person. He's not</p> <p>12 whatever.</p> <p>13 And Matt Bennett had talked to me</p> <p>14 and he's like, Greg learned his lesson.</p> <p>15 I still talk to Greg.</p> <p>16 You know, if, like -- we're</p> <p>17 looking for a director. Nobody seems to</p> <p>18 meet Daniel's qualifications. We're kind</p> <p>19 of spinning out of control here.</p> <p>20 Daniel feels more secure with him.</p> <p>21 You know, maybe we should bring him back</p> <p>22 and let -- or you should make the --</p> <p>23 inquire to bring him back.</p> <p>24 And Greg will be appreciative,</p> <p>Page 159</p>

<p>Page 160</p> <p>1 learn his lesson and not subject you to</p> <p>2 the same crap over and over again.</p> <p>3 And I was like that seems</p> <p>4 reasonable. If I did something wrong and</p> <p>5 I had a conscious and I knew I did</p> <p>6 something wrong, I would feel sorry and</p> <p>7 change my behavior.</p> <p>8 But that's not what happened. He</p> <p>9 brought Greg back and he got worse.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. I don't mean to be flippant here,</p> <p>12 but based on what you're describing to me it</p> <p>13 seems like for a company that's trying every</p> <p>14 which way to fire you, they're really bending</p> <p>15 over backwards to not fire you.</p> <p>16 MR. CARSON: I'm gonna object.</p> <p>17 You're mischaracterizing her prior</p> <p>18 testimony. She never said the company</p> <p>19 was trying to fire her.</p> <p>20 I'll object to the form.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. I'll expound on it.</p> <p>23 You said with respect to this</p> <p>24 website project that Greg went to Daniel and told</p>	<p>Page 162</p> <p>1 but what would be the point of constantly</p> <p>2 telling the boss false things -- like,</p> <p>3 you know, the president false things and</p> <p>4 taking them out of context over and over</p> <p>5 again?</p> <p>6 Was that to, like, make me feel</p> <p>7 good? Was it to -- was it to harass me?</p> <p>8 Was it to get my fired?</p> <p>9 It certainly wasn't for anything</p> <p>10 positive.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Maybe he's just a bad boss, no?</p> <p>13 MR. CARSON: Objection.</p> <p>14 Argumentative. You can answer.</p> <p>15 THE DEPONENT: No, sir.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. So, again, I'll ask the question</p> <p>18 in a different way that maybe will help you</p> <p>19 answer it.</p> <p>20 So we have Greg, all powerful,</p> <p>21 within MEF, you know, the guy, the decision</p> <p>22 maker, master manipulator, as you called him,</p> <p>23 brilliant with respect to playing people off of</p> <p>24 one another and getting his way. And all of</p>
<p>Page 161</p> <p>1 him that you weren't fully invested in the</p> <p>2 project in an effort to get you fired.</p> <p>3 Is that an accurate description of</p> <p>4 your testimony?</p> <p>5 A. Well, this wasn't, like, a -- this</p> <p>6 wasn't, like, a one-time thing that, like, -- if</p> <p>7 you tell somebody, like, they don't seem</p> <p>8 whatever, but it was -- he was -- Greg was doing</p> <p>9 these things over and over again to build up in</p> <p>10 Daniel's mind here that I was a terrible person,</p> <p>11 get what he ultimately wanted, was me out.</p> <p>12 Q. Why do you believe that Greg would</p> <p>13 have had to engage in this kind of a campaign</p> <p>14 against you for something as simple as having you</p> <p>15 fired if he had so much power?</p> <p>16 MR. CARSON: Objection.</p> <p>17 Speculative. Form.</p> <p>18 You can answer.</p> <p>19 THE DEPONENT: Because Daniel</p> <p>20 Pipes is -- I don't know honestly.</p> <p>21 I don't know. But that's what was</p> <p>22 happening.</p> <p>23 Okay. So even if he wasn't trying</p> <p>24 to get me fired, which I believe he was,</p>	<p>Page 163</p> <p>1 these things that you've testified to in the</p> <p>2 past.</p> <p>3 Why do you think he would have</p> <p>4 gone through so much trouble to try and get you</p> <p>5 fired instead of just firing you?</p> <p>6 A. Okay. Wait a minute.</p> <p>7 MR. CARSON: Look, I'm gonna</p> <p>8 object to the form of the question.</p> <p>9 Calls for speculation. You're</p> <p>10 asking her to testify about what was in</p> <p>11 Greg Roman's head.</p> <p>12 To the extent she knows, she can</p> <p>13 answer.</p> <p>14 THE DEPONENT: Greg did not start</p> <p>15 that telling Daniel Pipes things about me</p> <p>16 at all until -- until we reported Greg.</p> <p>17 So that was a change in his</p> <p>18 behavior. That was retaliatory.</p> <p>19 He did not -- he was not that bad</p> <p>20 boss that you want to claim -- that</p> <p>21 you're trying to insinuate here before</p> <p>22 that.</p> <p>23 He never -- he would only say good</p> <p>24 things to Daniel Pipes prior to -- to us</p>

<p>1 reporting him.</p> <p>2 Then -- excuse me. I'm not</p> <p>3 finished.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Go ahead.</p> <p>6 A. Then when -- then when we reported</p> <p>7 Greg and Greg was supposed to be not there or not</p> <p>8 reporting to us, that's when these instances kept</p> <p>9 coming in and coming in, coming in.</p> <p>10 That didn't happen before.</p> <p>11 Before that, Greg was hitting on</p> <p>12 me and being inappropriate with me and whatever.</p> <p>13 That new behavior, okay, that</p> <p>14 retaliatory behavior began after we reported Greg</p> <p>15 Roman.</p> <p>16 Q. Before the meeting in early</p> <p>17 November of 2015, whenever Greg -- or 2018, I'm</p> <p>18 sorry, whenever Greg had an issue with your work</p> <p>19 performance, he would come to you about it,</p> <p>20 right?</p> <p>21 A. No, actually. No. No. As a</p> <p>22 matter of fact, if he had any issue with what I</p> <p>23 was doing, he would usually tell Marnie to tell</p> <p>24 me, because he didn't want me to, like, not like</p>	<p>Page 164</p> <p>1 certain times and you talked about it, correct?</p> <p>2 Is that accurate?</p> <p>3 MR. CARSON: Objection. Object to</p> <p>4 form.</p> <p>5 THE DEPONENT: You are, again,</p> <p>6 mischaracterizing my testimony.</p> <p>7 He said things that were untrue</p> <p>8 and twisted things that I said and sent</p> <p>9 them to somebody else.</p> <p>10 When there were ever questions</p> <p>11 about my work --</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Before --</p> <p>14 A. I'm not finished. You're talking</p> <p>15 about the wrong time period here.</p> <p>16 Q. No, I'm not talking about any time</p> <p>17 period.</p> <p>18 A. Can I just finish my answer?</p> <p>19 Q. Sure.</p> <p>20 As long as you're answering the</p> <p>21 question I asked.</p> <p>22 A. I am trying to answer the question</p> <p>23 that you asked.</p> <p>24 The question that you asked was --</p> <p>Page 166</p>
<p>1 him or whatever.</p> <p>2 I don't know what his reasoning</p> <p>3 was. That was an assumption. But, like, no,</p> <p>4 because I remember saying to Marnie, are you the</p> <p>5 Human Resources Director or are you my boss?</p> <p>6 Because if Greg has a problem with</p> <p>7 my work, maybe he should discuss it with me.</p> <p>8 Q. Is it your testimony that prior to</p> <p>9 November 1st, 2018, Greg Roman never came to you</p> <p>10 with a problem?</p> <p>11 MR. CARSON: Objection. Not what</p> <p>12 she said. You can answer.</p> <p>13 THE DEPONENT: There were times</p> <p>14 where, like you characterized before, we</p> <p>15 had disagreements about things.</p> <p>16 But I was always pretty good at my</p> <p>17 job. And there wasn't really any</p> <p>18 complaints. And I have no documentation</p> <p>19 in my personnel file of anything that I</p> <p>20 ever did wrong.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Okay. But just like in any normal</p> <p>23 employer/employee supervisory relationship, you</p> <p>24 had issues about the work that was being done at</p>	<p>Page 165</p> <p>1 do you want to repeat it?</p> <p>2 Q. The question was, prior to the</p> <p>3 November 1st meeting, isn't it fair to say that</p> <p>4 like any normal employer/employee,</p> <p>5 supervisor/supervisee, you had discussions about</p> <p>6 your work?</p> <p>7 MR. CARSON: Object to form.</p> <p>8 Mischaracterization of prior testimony.</p> <p>9 THE DEPONENT: And, again, I will</p> <p>10 say that the -- we are talk -- you are</p> <p>11 talking about two different things.</p> <p>12 If he was unhappy with my work and</p> <p>13 he would say something to Marnie, it was</p> <p>14 something legitimate.</p> <p>15 It was, I didn't do something fast</p> <p>16 enough. And it was legitimate.</p> <p>17 What happened after</p> <p>18 November 2019 --</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. That's not my question.</p> <p>21 A. Excuse me. I'm not finished.</p> <p>22 Q. You're answering a question I</p> <p>23 didn't answer.</p> <p>24 A. It doesn't matter. This is part</p> <p>Page 167</p>



<p style="text-align: right;">Page 168</p> <p>1 of my answer. And you know that that's okay and</p> <p>2 you're not allowed to cut me off.</p> <p>3 MR. CARSON: Why don't you finish</p> <p>4 this question and we'll take like a</p> <p>5 five-minute little breather.</p> <p>6 MR. CAVALIER: That's fine, Seth.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. The question was only about -- I'm</p> <p>9 going to ask you the question that you want to</p> <p>10 answer. But I'm trying to keep the record clean.</p> <p>11 So, again, you talked about what</p> <p>12 Greg said to Marnie at certain points. That's</p> <p>13 not what I'm asking you.</p> <p>14 It's a very simple question. And,</p> <p>15 I mean, you seem to be thinking I'm trying to</p> <p>16 trick you here.</p> <p>17 It's a very basic question.</p> <p>18 Did you and Greg Roman, prior to</p> <p>19 November 1st, 2018, ever have discussions about</p> <p>20 your work for the Middle East Forum?</p> <p>21 A. Of course. He's my boss.</p> <p>22 Q. Of course. He's your boss.</p> <p>23 After November 1st, 2018, he was</p> <p>24 not allowed to have those discussions with you,</p>	<p style="text-align: right;">Page 170</p> <p>1 constitutes retaliation in your mind?</p> <p>2 MR. CARSON: Objection. Object to</p> <p>3 form. You can answer.</p> <p>4 THE DEPONENT: Yes.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Okay.</p> <p>7 MR. CAVALIER: Do you want to take</p> <p>8 a break, Seth?</p> <p>9 MR. CARSON: Yeah, I think just a</p> <p>10 little breather would help.</p> <p>11 THE DEPONENT: Yeah, I have to go</p> <p>12 to the bathroom anyway.</p> <p>13 MR. CAVALIER: Do you want to take</p> <p>14 10?</p> <p>15 MR. CARSON: Yeah, 10 minutes is</p> <p>16 good.</p> <p>17 THE VIDEOGRAPHER: The time is</p> <p>18 1:13 p.m.</p> <p>19 We are off the record.</p> <p>20 The time is 1:34 p.m.</p> <p>21 (Recess taken.)</p> <p>22 THE VIDEOGRAPHER: We are back on</p> <p>23 the record.</p> <p>24</p>
<p style="text-align: right;">Page 169</p> <p>1 correct?</p> <p>2 A. He did anyway.</p> <p>3 Q. When?</p> <p>4 A. Via e-mail. For the normal</p> <p>5 discussions about my work, okay, that was done</p> <p>6 on -- he was allowed to contact us during normal</p> <p>7 business hours and via e-mail.</p> <p>8 So if he didn't like something</p> <p>9 that I did or he was unhappy with some of my work</p> <p>10 product he would tell me.</p> <p>11 Q. Right.</p> <p>12 A. He would tell me. Okay.</p> <p>13 However, what he did that was</p> <p>14 different was make things up and tell Daniel</p> <p>15 instead of coming to me. That's what he did. He</p> <p>16 did both things.</p> <p>17 The only thing that was new, the</p> <p>18 new behavior, was that he was lying to Daniel</p> <p>19 Pipes about stuff about me.</p> <p>20 Q. Good. Then this is useful. This</p> <p>21 is why I am asking the questions. Now I</p> <p>22 understand where you're coming from.</p> <p>23 So it's that lying to Daniel Pipes</p> <p>24 between November 1st, 2018, and May of 2019, that</p>	<p style="text-align: right;">Page 171</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Okay. When we left off,</p> <p>3 Ms. Barbounis, we were talking about the period</p> <p>4 of time between November 1st, 2018, and May of</p> <p>5 2019.</p> <p>6 During that time period, were you</p> <p>7 ever disciplined by the Middle East Forum?</p> <p>8 A. What do you mean by disciplined?</p> <p>9 Q. Were you ever issued a written</p> <p>10 reprimand, for example, by the Middle East Forum</p> <p>11 for your employment?</p> <p>12 A. I was actually written a couple</p> <p>13 and then when I responded to them -- when I</p> <p>14 responded to them, they seemed to disappear,</p> <p>15 because I countered what they said, so...</p> <p>16 Q. Okay. So when I asked you if you</p> <p>17 had been reprimanded, you said that you received</p> <p>18 them and responded to them.</p> <p>19 What exactly are you talking</p> <p>20 about?</p> <p>21 A. Like, for example, Mark Fink wrote</p> <p>22 me a reprimand about attending the National</p> <p>23 Conservative -- the National Conservative</p> <p>24 Conference in Washington, D.C.</p>

<p>Page 172</p> <p>1 And he wrote this huge, whole long</p> <p>2 four paragraph e-mail to me about how I was told</p> <p>3 that I had to convey my political -- my political</p> <p>4 dealings or things like that with them, with the</p> <p>5 Middle East Forum, and I didn't do that.</p> <p>6 And it had been brought to his</p> <p>7 attention by Daniel Pipes that I was -- attended</p> <p>8 this conference.</p> <p>9 And so then I responded to that</p> <p>10 e-mail by saying, Daniel Pipes gave me</p> <p>11 permission. And I gave him the screenshots of</p> <p>12 the permission that Daniel Pipes gave to me.</p> <p>13 And then he never replied to me</p> <p>14 either.</p> <p>15 So that was a written reprimand,</p> <p>16 but when I showed him that I had already received</p> <p>17 permission from Daniel Pipes, nobody said</p> <p>18 anything after that again.</p> <p>19 Q. Okay.</p> <p>20 A. So yes and no.</p> <p>21 Q. Okay. So you call that a</p> <p>22 reprimand, that sounds like it was an e-mail</p> <p>23 questioning your employment performance in a</p> <p>24 certain area.</p>	<p>Page 174</p> <p>1 Gary, who got the work, was more accomplished in</p> <p>2 this area and so that they were -- they were</p> <p>3 giving him, like -- honestly, he been doing --</p> <p>4 that's who did our website for, like, 10 years,</p> <p>5 uploading the things as the MEF online editor.</p> <p>6 He had been doing it for a very</p> <p>7 long time and so that he said that, you know, he</p> <p>8 has been doing this and we're gonna take it away.</p> <p>9 And so then there were times where</p> <p>10 I said, Daniel, then, like, what I am going to be</p> <p>11 doing if Gary is doing all my work?</p> <p>12 So, yes, my job and my</p> <p>13 responsibilities were diminished, correct. Yes.</p> <p>14 Q. This is the same -- the same</p> <p>15 website responsibilities you were telling me</p> <p>16 about earlier?</p> <p>17 A. Correct.</p> <p>18 Q. Did you have a problem with the</p> <p>19 fact that they were taking the website</p> <p>20 responsibilities and giving them back to Gary?</p> <p>21 A. Yeah. I mean, I was starting to,</p> <p>22 like, understand it and enjoy it. And I always</p> <p>23 knew and I told Daniel in the beginning when he</p> <p>24 asked me if I was all in, I was all in.</p>
<p>Page 173</p> <p>1 A. That's why I said, what do you</p> <p>2 mean by reprimand? What do you mean by --</p> <p>3 Q. Was there ever a written reprimand</p> <p>4 placed in your file regarding any of your</p> <p>5 employment activities?</p> <p>6 A. No.</p> <p>7 Q. Okay. Was your salary ever</p> <p>8 reduced?</p> <p>9 A. No.</p> <p>10 Q. Were you ever placed on probation?</p> <p>11 A. No.</p> <p>12 Q. Were you ever put on a performance</p> <p>13 improvement plan?</p> <p>14 A. No.</p> <p>15 Q. Were your responsibilities ever</p> <p>16 reduced?</p> <p>17 A. Yes.</p> <p>18 Q. In what way?</p> <p>19 A. When -- so they had an employee</p> <p>20 that had quit and come back. And Daniel hired</p> <p>21 him. And then they started reducing -- giving</p> <p>22 him most of my work and reducing my work.</p> <p>23 And I had said something to Daniel</p> <p>24 Pipes about it. And he just said that -- that</p>	<p>Page 175</p> <p>1 And I thought I was doing a pretty</p> <p>2 good job. Granted, there was a learning curve.</p> <p>3 But I wanted to forward the mission of MEF, so</p> <p>4 yeah.</p> <p>5 Q. Is it fair to say then that Gary</p> <p>6 was more experienced in that area than you were?</p> <p>7 A. Gary was more experienced, yes.</p> <p>8 That's fair.</p> <p>9 Q. Is it fair to say that he had more</p> <p>10 skills in that area than you did?</p> <p>11 A. Yes, he did.</p> <p>12 Q. And despite the fact that they</p> <p>13 took this responsibility away from you, again,</p> <p>14 your salary wasn't reduced as a result, correct?</p> <p>15 A. This was in a very short time</p> <p>16 frame before I left, but yeah.</p> <p>17 Q. Okay. So that's a great point.</p> <p>18 When did this occur? Because,</p> <p>19 again, remember we're talking about November 1</p> <p>20 through May 8th of 2019.</p> <p>21 A. I don't remember when Gary got</p> <p>22 hired.</p> <p>23 Remember, I left in, like, August.</p> <p>24 But I don't remember when Gary got</p>

<p style="text-align: right;">Page 176</p> <p>1 hired, but it was a slow progression. Like they</p> <p>2 would give him a little and they would give him a</p> <p>3 little more, give him a little more.</p> <p>4 Q. Okay.</p> <p>5 A. And, you know, --</p> <p>6 Q. Okay. And then just to be clear,</p> <p>7 at no time during your employment at the Middle</p> <p>8 East Forum were you ever fired, correct?</p> <p>9 A. Was I asked to leave? No. Never.</p> <p>10 Q. Okay. And you were never forced</p> <p>11 to leave?</p> <p>12 A. I was forced to leave.</p> <p>13 Q. Well, you were never told to</p> <p>14 leave?</p> <p>15 A. That's exactly what I said, I was</p> <p>16 never asked to leave or told to leave.</p> <p>17 Q. Right.</p> <p>18 Did you feel like you were doing a</p> <p>19 good job with the website at MEF?</p> <p>20 A. Like anybody else, there were</p> <p>21 times where I had doubt and I was upset with some</p> <p>22 things, like, sometimes, you know, -- like</p> <p>23 anything that you're trying to learn and be good</p> <p>24 at, there are times where you're, like, I suck at</p>	<p style="text-align: right;">Page 178</p> <p>1 A. That doesn't mean necessarily just</p> <p>2 because he's been doing it a long time doesn't</p> <p>3 mean it's better, he's better at it. But I'm</p> <p>4 just saying, like, Gary had been doing it. And</p> <p>5 that's the excuse that they used. But like I</p> <p>6 said, that's subjective.</p> <p>7 Q. Well --</p> <p>8 A. By that time, I was getting pretty</p> <p>9 good at it.</p> <p>10 Q. You're saying, it's subjective as</p> <p>11 to whether he was better at it than you, but it's</p> <p>12 not subjective as to whether he had more</p> <p>13 experience and more skills, correct?</p> <p>14 A. Skills is relative, but more</p> <p>15 experience is accurate.</p> <p>16 Q. Okay. And to be clear, this is</p> <p>17 what he was doing for the Forum before he left,</p> <p>18 correct?</p> <p>19 A. Part of it, yes. Yes. I will add</p> <p>20 he left because of Greg.</p> <p>21 Q. Why did he leave?</p> <p>22 A. He saw how everybody was being</p> <p>23 treated.</p> <p>24 Q. Was Gary being treated poorly?</p>
<p style="text-align: right;">Page 177</p> <p>1 this, I need to get better.</p> <p>2 And honestly there were times</p> <p>3 where I needed -- it was new. All new to me. I</p> <p>4 never did anything like this in my entire life.</p> <p>5 So, yeah, of course, there were</p> <p>6 plenty of times where I was frustrated and it was</p> <p>7 harder than expected or there was websites -- it</p> <p>8 got easier after we moved from one platform to</p> <p>9 another, but yeah.</p> <p>10 Q. Do you think that the Forum had a</p> <p>11 legitimate reason for transferring those</p> <p>12 responsibilities to Gary?</p> <p>13 A. No, at that point -- by the time</p> <p>14 Gary got there, I was getting pretty good at</p> <p>15 that.</p> <p>16 Q. But not as good as Gary?</p> <p>17 A. I mean, that's subjective.</p> <p>18 Q. Right.</p> <p>19 But you just told me earlier that</p> <p>20 Gary had more skills in that area and more</p> <p>21 experience.</p> <p>22 A. Well, Gary had been doing it for a</p> <p>23 long time.</p> <p>24 Q. Right.</p>	<p style="text-align: right;">Page 179</p> <p>1 A. No. Gary and Greg just constantly</p> <p>2 had -- I don't think Gary was treated poorly at</p> <p>3 all.</p> <p>4 Gary and Greg just had differences</p> <p>5 in opinions of how things should run. And so</p> <p>6 Gary said, I like my way and so I'm going to</p> <p>7 leave.</p> <p>8 Q. Okay. Can you give me an example</p> <p>9 of what you mean by that?</p> <p>10 A. That's all I really remember.</p> <p>11 Q. Okay. And yet he then decided to</p> <p>12 come back?</p> <p>13 A. Yeah. He said he came back</p> <p>14 because he liked the mission and liked Daniel.</p> <p>15 Everybody that does this work is</p> <p>16 mission driven. That's the kind of industry it</p> <p>17 is.</p> <p>18 Q. Does Gary have a Master's in</p> <p>19 Middle East studies?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you know where he went to</p> <p>22 school?</p> <p>23 A. I do not know.</p> <p>24 Q. Do you know how long Gary has been</p>

<p>Page 180</p> <p>1 engaged in the --</p> <p>2 A. I don't know much about Gary, to</p> <p>3 be honest.</p> <p>4 Q. Okay. How long did the Gary work</p> <p>5 for the Forum before he resigned the first time?</p> <p>6 A. I don't know.</p> <p>7 Q. Okay. Do you think that the</p> <p>8 Middle East Forum giving Gary the</p> <p>9 responsibilities of the website back was</p> <p>10 retaliation against you?</p> <p>11 MR. CARSON: Objection. Calls for</p> <p>12 a legal conclusion.</p> <p>13 THE DEPONENT: I wasn't -- that</p> <p>14 was a Daniel Pipes decision. And I</p> <p>15 don't -- I didn't -- I don't know -- I</p> <p>16 don't know the motives behind that, so I</p> <p>17 can't -- I can't say what is or isn't.</p> <p>18 At the time there were -- there</p> <p>19 were instances where it felt like that</p> <p>20 and there were times that it didn't. So</p> <p>21 I don't know. The answer to that is I</p> <p>22 don't know.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Do you have any reason to believe</p>	<p>Page 182</p> <p>1 I cannot -- I can see it. I can't</p> <p>2 read the writing on it.</p> <p>3 Q. I can blow it up for you.</p> <p>4 But I just want to identify it</p> <p>5 first.</p> <p>6 MR. CAVALIER: Can I have this</p> <p>7 marked as Exhibit A?</p> <p>8 (Deposition Exhibit A marked.)</p> <p>9 THE DEPONENT: I can't see what</p> <p>10 any of that is.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Yeah, I'll blow it up for you. I</p> <p>13 know you can't.</p> <p>14 Let's just identify the document</p> <p>15 and figure out what it is.</p> <p>16 So this is a text message change.</p> <p>17 Do you know what I mean when I say</p> <p>18 a text message chain?</p> <p>19 A. Yes, I do. Yeah.</p> <p>20 Q. And let's just identify it for the</p> <p>21 record. See this number up top? See my cursor</p> <p>22 --</p> <p>23 A. That's me. I see it. That's me</p> <p>24 and Delaney. I'm very. I understand?</p>
<p>Page 181</p> <p>1 or any factual information that would indicate</p> <p>2 that the decision made by Daniel Pipes to give</p> <p>3 those responsibilities to Gary was related to</p> <p>4 your complaints about Greg Roman?</p> <p>5 A. I don't -- I don't know.</p> <p>6 Q. Well, the question is whether you</p> <p>7 have any information?</p> <p>8 A. I don't know. Maybe if I scoured</p> <p>9 through my old MEF e-mails, I would remember.</p> <p>10 But I don't know. I don't remember.</p> <p>11 Q. So sitting here today, you're not</p> <p>12 aware that you have any information that would</p> <p>13 indicate that that decision by Daniel Pipes was</p> <p>14 tied in any way to your complaint about Greg</p> <p>15 Roman --</p> <p>16 A. Again, I don't know.</p> <p>17 Q. Did that transfer of</p> <p>18 responsibilities to Gary have anything to do with</p> <p>19 your decision to quit Middle East Forum?</p> <p>20 A. No.</p> <p>21 Q. Okay. Just pulling up a document.</p> <p>22 Give me one second.</p> <p>23 Can you see that document?</p> <p>24 A. Can I see the document?</p>	<p>Page 183</p> <p>1 Q. No, I know you get it.</p> <p>2 But it's important for the record</p> <p>3 that we identify the document so it's clear what</p> <p>4 we're talking about.</p> <p>5 Okay?</p> <p>6 A. Uh-huh.</p> <p>7 Q. So then it's fair to say this is a</p> <p>8 text message chain between you and Delaney,</p> <p>9 right?</p> <p>10 A. Yes.</p> <p>11 Q. Starts, it appears, on May 29,</p> <p>12 2019, and runs through June 2nd, 2019, correct?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Okay. To be fair, we'll start at</p> <p>15 the top.</p> <p>16 This is dated 5/30/2019, from</p> <p>17 Delaney to you. You're talking about what, I</p> <p>18 don't know. Doesn't really matter, because I</p> <p>19 want to go down to this text message and talk</p> <p>20 about it.</p> <p>21 Can you see that or do you need me</p> <p>22 to make it big?</p> <p>23 A. I see it. It's a picture.</p> <p>24 Q. Yes. So I'm gonna blow it up.</p>



<p>Page 184</p> <p>1 We'll identify the picture.</p> <p>2 So it's a picture file here. I'm</p> <p>3 gonna bring up --</p> <p>4 A. I think it's a picture of Ben</p> <p>5 Baird, if I'm looking right.</p> <p>6 Q. So I will either ask you to</p> <p>7 confirm or I will represent to you, if you're</p> <p>8 more comfortable with it, that picture there</p> <p>9 marked file name IMG_4311.HEIC is this picture,</p> <p>10 which mark as Exhibit B.</p> <p>11 A. Yep.</p> <p>12 (Deposition Exhibit Number B</p> <p>13 marked.)</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Do we agree that's the same</p> <p>16 picture?</p> <p>17 A. Yep.</p> <p>18 Q. We talked a little bit about this</p> <p>19 picture in the last deposition.</p> <p>20 I want to ask you some more</p> <p>21 questions about it.</p> <p>22 Who is that in the picture?</p> <p>23 A. Benjamin Baird.</p> <p>24 Q. When was it taken?</p>	<p>Page 186</p> <p>1 of what they do, they cite that they are -- that</p> <p>2 they are affiliated with the Middle East Forum.</p> <p>3 Whereas, like, -- so, whereas, an</p> <p>4 employee would be subject to, you know, like,</p> <p>5 directives and things, like -- so what Benjamin</p> <p>6 Baird would do is he would write an article on</p> <p>7 his own time about his on topic, as long as it</p> <p>8 was, like, related to the Middle East studies or</p> <p>9 Islam or Islamism or anything like that.</p> <p>10 And then he would just say at the</p> <p>11 bottom, the requirement is at the bottom for</p> <p>12 whatever work he does -- and that work does not</p> <p>13 get checked by Daniel or Greg or anybody.</p> <p>14 But then at the bottom he would</p> <p>15 say, you know, fellow at the Middle East Forum.</p> <p>16 Q. Was he paid by the Middle East</p> <p>17 Forum?</p> <p>18 A. I think he -- I don't know his</p> <p>19 exact agreement. Some fellows were paid. Some</p> <p>20 fellows aren't paid.</p> <p>21 Q. Do you know whether he was subject</p> <p>22 to the Middle East Forum's policies and</p> <p>23 procedures?</p> <p>24 A. I don't know.</p>
<p>Page 185</p> <p>1 A. Whatever that date is -- whatever</p> <p>2 is the date on that -- 5 -- 5/30/2019.</p> <p>3 Q. Okay. I think that's the date the</p> <p>4 message was sent.</p> <p>5 But to the best of your</p> <p>6 recollection, does that date seem like the date</p> <p>7 you would have taken that picture?</p> <p>8 A. Sure, I guess. I don't remember.</p> <p>9 Q. Okay.</p> <p>10 A. I mean, I remember that's when I</p> <p>11 was at the -- an event in D.C.</p> <p>12 Q. Okay. And Ben Baird was a Middle</p> <p>13 East Forum employee, correct?</p> <p>14 A. No.</p> <p>15 Q. Was he a Middle East Forum</p> <p>16 contractor?</p> <p>17 A. Nope.</p> <p>18 Q. Did he do work for the Middle East</p> <p>19 Forum?</p> <p>20 A. He was a fellow and a contributor.</p> <p>21 Q. Educate me on the distinction</p> <p>22 you're drawing between a fellow and an employee.</p> <p>23 A. A fellow is like a grantee. They</p> <p>24 can do whatever they want, as long as at the end</p>	<p>Page 187</p> <p>1 Q. You said you don't know?</p> <p>2 A. I do not know.</p> <p>3 Q. Okay.</p> <p>4 A. I'm not involved in his, like --</p> <p>5 you know, in his agreements.</p> <p>6 Q. Where did he do his work for the</p> <p>7 Middle East Forum physically?</p> <p>8 A. At his home.</p> <p>9 Q. Where is his home?</p> <p>10 A. I believe in Ohio.</p> <p>11 Q. Okay.</p> <p>12 A. It wasn't work for the Middle East</p> <p>13 Forum.</p> <p>14 It was his work and then he</p> <p>15 would -- he would have done that on his own. So</p> <p>16 he, like, -- I don't know how to explain this to</p> <p>17 you, because you don't seem to understand.</p> <p>18 But, like, say he writes an</p> <p>19 article for the Jerusalem Post. Okay? That</p> <p>20 would be an article he gets paid for to do by the</p> <p>21 Jerusalem Post.</p> <p>22 His agreement with MEF is just</p> <p>23 that he says that he's affiliated with them.</p> <p>24 That's what he did.</p>

<p>Page 188</p> <p>1 So it's not work for -- like, 2 Middle East Forum doesn't assign him work. 3 They may now, because he's an 4 employee now. But that's not what he was when he 5 was there. 6 He would produce his own articles 7 and just say I'm affiliated with MEF. 8 Q. Do you know when he applied to 9 become an employee at MEF? 10 A. I don't. 11 Q. Are you certain that he was not an 12 employee on May 30th, 2019? 13 A. I don't believe he was an employee 14 until after I left, because I remember him saying 15 to me later, oh, I got the job. I believe. 16 Q. Okay. And just to be clear for 17 the record, this appears to be, what, June, July, 18 August -- three months approximately before you 19 left? 20 A. It was May. 21 Q. Right. 22 A. Right. 23 So he was not an employee of MEF 24 at this time.</p>	<p>Page 190</p> <p>1 interview. And I don't even think I went in MEF 2 capacity. I just went. 3 Q. I don't understand the distinction 4 you're drawing there. 5 You're saying -- you say you went 6 to the interview with him. He's an MEF fellow. 7 You're at this point in time Director of 8 Communications for MEF. 9 A. He also worked for another 10 publication. He was an actual employee of 11 another organization at the time. 12 That's not how this works. 13 Q. Right. 14 But the interview that was set up 15 for him, it was set up with your involvement? 16 A. I don't know that. I don't 17 remember that. 18 But even if it was, there are 19 plenty of other things that, like, for example, 20 my old boss, Congressman Costello, asked me to 21 set up interviews, too, right? 22 But he's never talking about 23 Middle East studies or anything related. 24 I don't remember what the topic</p>
<p>Page 189</p> <p>1 Q. Right. I understand that. 2 But what I'm saying to you, this 3 message that you sent was sent approximately 4 three months or so before you left the Forum? 5 A. Yeah. 6 Q. Okay. Did you ever set up any 7 interviews for Ben Baird? 8 A. Yes. 9 Q. Where? 10 A. With One American News Network. 11 Q. When? 12 A. I don't remember the date. 13 Q. What capacity did you set that 14 interview up for him in? 15 A. I don't remember. I don't 16 actually remember if I actually did it. 17 I know I went with him, but I 18 don't know if they asked to speak to him on their 19 own or they asked me to find them someone to 20 speak on the topic. 21 I don't really remember how all 22 that worked honestly. 23 He may have gotten that interview 24 on his own. But I did go with him there to the</p>	<p>Page 191</p> <p>1 Ben was talking about either. 2 But, like, if I did -- if I did 3 that for somebody else, that's not in an MEF 4 capacity. 5 Like that would be, like, oh, you 6 know -- I do that for people now and it's not in 7 the capacity of my current job. 8 It's I have connections. We have 9 connections. And if somebody needs assistance, 10 like it wouldn't have been in an MEF capacity, I 11 don't believe anyway. Like I said, I don't know 12 the circumstances about the interview. I don't 13 remember. 14 Q. Were you the Director of 15 Communications for the Middle East Forum at this 16 point? 17 A. First of all, I was only Director 18 of Communications in name only and there's an 19 e-mail to that effect. 20 Q. Was your title the Director of 21 Communications at the Middle East Forum at this 22 point? 23 A. Not internally, only externally. 24 Q. Externally was your title</p>

<p style="text-align: right;">Page 192</p> <p>1 Direction of Communications for Middle East Forum</p> <p>2 at this point in time?</p> <p>3 A. Yes.</p> <p>4 Q. Did you set up interviews for</p> <p>5 Middle East Forum fellows as the Director of</p> <p>6 Communications during this period of time?</p> <p>7 A. Occasionally. But I don't know if</p> <p>8 this is one of them.</p> <p>9 Q. Right.</p> <p>10 But he -- Ben Baird is an MEF</p> <p>11 fellow, correct? Or was during this period of</p> <p>12 time?</p> <p>13 A. Is, yes.</p> <p>14 Q. Okay. So then how are you of the</p> <p>15 belief that this may not have been an interview</p> <p>16 that you set up through your capacity as the</p> <p>17 communications director for the Middle East</p> <p>18 Forum?</p> <p>19 A. Because I also set up interviews</p> <p>20 for Sidney Watson, who was unaffiliated with the</p> <p>21 Middle East Forum, at the time. And I didn't do</p> <p>22 it in my capacity as an MEF employee.</p> <p>23 I also organized events for Jack</p> <p>24 Corsovek in another capacity as my Republican</p>	<p style="text-align: right;">Page 194</p> <p>1 is, decides he wants to set up his own interview</p> <p>2 somewhere else, if he doesn't want to use the MEF</p> <p>3 capacity, he doesn't have to.</p> <p>4 So this, again, is -- may or may</p> <p>5 not have been in an official capacity.</p> <p>6 And by the way, the date that</p> <p>7 you're talking about, this was for the National</p> <p>8 Conservative Conference. And I don't think this</p> <p>9 had anything to do with an interview. If I</p> <p>10 remember correctly, which, like I said, it's</p> <p>11 hazy.</p> <p>12 Q. I don't even understand, what</p> <p>13 doesn't have anything to do with an interview?</p> <p>14 A. The date of the text messages that</p> <p>15 you are showing me.</p> <p>16 Q. Yeah.</p> <p>17 We're not talking about the text</p> <p>18 messages having anything to do with an</p> <p>19 interview.</p> <p>20 A. Then why are they up on the</p> <p>21 screen? I thought that's what the line of the</p> <p>22 questioning was. I'm confused.</p> <p>23 Q. Well, we're going to get to the</p> <p>24 text messages. But we were just asking whether</p>
<p style="text-align: right;">Page 193</p> <p>1 committee woman thing.</p> <p>2 I mean, there's plenty of ways</p> <p>3 that I do things outside -- advocacy outside that</p> <p>4 is unrelated to MEF.</p> <p>5 Q. But then there is related to MEF,</p> <p>6 correct?</p> <p>7 MR. CARSON: Objection.</p> <p>8 THE DEPONENT: I just answered</p> <p>9 this. He was an official employee of</p> <p>10 another organization.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Right.</p> <p>13 But those other people that you</p> <p>14 just mentioned as setting up interviews on your</p> <p>15 own time, unrelated to MEF, they were not MEF</p> <p>16 fellows, correct?</p> <p>17 A. Rahiem Kasam is. And he's an</p> <p>18 unpaid fellow. He is.</p> <p>19 And there were plenty of things</p> <p>20 that, like, he, you know, he wanted to talk to</p> <p>21 people, even though Rahiem has more connections</p> <p>22 than I do.</p> <p>23 But if Rahiem Kasam, as a fellow,</p> <p>24 who doesn't get paid or whatever his situation</p>	<p style="text-align: right;">Page 195</p> <p>1 you set up interviews for Ben Baird as Director</p> <p>2 of Communications?</p> <p>3 A. I don't remember. And my answer</p> <p>4 again to that is I don't remember if I did it as</p> <p>5 Director of Communications.</p> <p>6 MR. CARSON: And also, just object</p> <p>7 to calling her Director of Communications</p> <p>8 when she testified that that was a title</p> <p>9 that she was permitted to use externally</p> <p>10 only and she was notified that she was</p> <p>11 never really a Director of</p> <p>12 Communications.</p> <p>13 THE DEPONENT: Correct.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Why does the distinction matter to</p> <p>16 you as to whether you set this interview up in</p> <p>17 your capacity as Director of Communications --</p> <p>18 A. Because the whole point -- because</p> <p>19 the whole point is that they're acting like they</p> <p>20 did me some big favor and they didn't. Like they</p> <p>21 didn't do anything.</p> <p>22 They were actually derogatory</p> <p>23 about the whole thing. So whenever -- you</p> <p>24 have -- in my previous depositions, you guys have</p>

<p>Page 196</p> <p>1 said to me, you know, well, didn't you get --</p> <p>2 didn't you get a -- what is it? Like, didn't</p> <p>3 you -- weren't you rewarded by getting a higher</p> <p>4 position? But I wasn't. That's all fake.</p> <p>5 Q. I'm not even talking about your</p> <p>6 position.</p> <p>7 A. You did, though, before.</p> <p>8 Previously. You personally did before. And so</p> <p>9 that's -- that's what I'm thinking about.</p> <p>10 MR. CARSON: Yeah, I also want to</p> <p>11 just object to what -- the distinction</p> <p>12 she's making is a factual distinction.</p> <p>13 So it's important to make sure the</p> <p>14 record is clear.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. The question is a simple one.</p> <p>17 It's why -- why does the</p> <p>18 distinction matter to you as to whether you set</p> <p>19 this interview up with Ben Baird that we're</p> <p>20 talking about in your capacity as an MEF employee</p> <p>21 or not?</p> <p>22 A. Because you asked me if I did as</p> <p>23 an employee or not and I'm saying I don't know.</p> <p>24 Q. Okay.</p>	<p>Page 198</p> <p>1 as Delaney Yonchek was doing them, I supervised</p> <p>2 her.</p> <p>3 So, yeah, I assisted in that many.</p> <p>4 Correct.</p> <p>5 Q. You didn't draw the distinction</p> <p>6 there --</p> <p>7 A. Oh, I did draw the distinction</p> <p>8 there. I did absolutely draw the distinction</p> <p>9 there.</p> <p>10 Q. You didn't say that I set up 90</p> <p>11 interviews, some of which were in my capacity as</p> <p>12 Director of Communications for MEF and some of</p> <p>13 which were in my own personal time, for my own</p> <p>14 personal need.</p> <p>15 A. For brevity -- oh, no, because</p> <p>16 that's not what I was saying.</p> <p>17 And in my capacity, I did set up</p> <p>18 over -- with -- I said I assisted in setting up</p> <p>19 90.</p> <p>20 I did not say on my own time. I</p> <p>21 didn't even reference my own time in that,</p> <p>22 because this is not an own time thing.</p> <p>23 And I still do stuff on my own</p> <p>24 time and my job is aware of it, just like before.</p>
<p>Page 197</p> <p>1 A. Okay. The distinction is one you</p> <p>2 asked.</p> <p>3 You said, did you set this up as</p> <p>4 an MEF employee. And I said, I don't know. And</p> <p>5 you asked me, how do I not know. So I explained</p> <p>6 it to you.</p> <p>7 Q. I didn't ask you how you didn't</p> <p>8 know. But --</p> <p>9 A. You did.</p> <p>10 Q. -- you seem to place a great deal</p> <p>11 of importance on that distinction when I was</p> <p>12 just --</p> <p>13 A. I'm just trying to keep the facts</p> <p>14 straight, because you seem to be -- in my</p> <p>15 opinion, you seem to be confusing a lot of</p> <p>16 things. And you clearly don't understand how the</p> <p>17 process of the fellowship works.</p> <p>18 Q. You did, however, submit a resume</p> <p>19 to your current employer stating that you</p> <p>20 arranged 90 interviews for MEF personnel in your</p> <p>21 capacity as Director of Communications, correct?</p> <p>22 A. So I said in there, and if you</p> <p>23 look at those words correctly, assisted.</p> <p>24 Meaning, as I was doing them and</p>	<p>Page 199</p> <p>1 Q. And so we're clear, though, in</p> <p>2 that same resume, you listed your title as</p> <p>3 Director of Communications for MEF?</p> <p>4 A. That was my outward title.</p> <p>5 Q. Right.</p> <p>6 So it wasn't purely in name?</p> <p>7 MR. CARSON: Objection.</p> <p>8 Argumentative.</p> <p>9 THE DEPONENT: What was the word</p> <p>10 you used?</p> <p>11 MR. CARSON: We all know what --</p> <p>12 you can answer. Go ahead.</p> <p>13 THE DEPONENT: Go ahead.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. So it wasn't purely in name only</p> <p>16 if you were using it for your resume.</p> <p>17 MR. CARSON: Objection.</p> <p>18 Argumentative. Assuming facts not in</p> <p>19 evidence.</p> <p>20 THE DEPONENT: I certainly gained</p> <p>21 the experience of actually being a</p> <p>22 Director of Communications. And so the</p> <p>23 only way to convey that was the title.</p> <p>24</p>



<p>Page 200</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Right.</p> <p>3 And so you believed that you were</p> <p>4 qualified and entitled to use that title on your</p> <p>5 resume, right?</p> <p>6 MR. CARSON: Objection.</p> <p>7 THE DEPONENT: Well, if I put</p> <p>8 anything else, when the website said it,</p> <p>9 even though Daniel Pipes didn't,</p> <p>10 whatever, it would look inconsistent.</p> <p>11 To the outside world, that's what</p> <p>12 the title was.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. I understand that.</p> <p>15 But you didn't put it on the</p> <p>16 website --</p> <p>17 A. It doesn't seem that way.</p> <p>18 Q. You didn't put it on the website,</p> <p>19 right?</p> <p>20 A. What?</p> <p>21 Q. Your title as Director of</p> <p>22 Communications, you didn't --</p> <p>23 A. I actually did put it on the</p> <p>24 website.</p>	<p>Page 202</p> <p>1 Argumentative. The record speaks for</p> <p>2 itself.</p> <p>3 THE DEPONENT: I guess. Whatever</p> <p>4 you want.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. It's a simple question.</p> <p>7 A. No, not.</p> <p>8 MR. CARSON: She answered the</p> <p>9 question though.</p> <p>10 She explained to you that she was</p> <p>11 not provided any -- anything but the</p> <p>12 ability to let people on the outside know</p> <p>13 that that's what her title was.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Well, so taking your counsel's</p> <p>16 representation there, that if all it was was a</p> <p>17 fake title that you could let people on the</p> <p>18 outside know about, don't you think it was</p> <p>19 misleading for future potential employers if you</p> <p>20 were telling them that you were Director of</p> <p>21 Communications?</p> <p>22 A. No. And I'll tell you why it</p> <p>23 wasn't.</p> <p>24 MR. CARSON: Objection. You can</p>
<p>Page 201</p> <p>1 Q. Okay. Fair enough.</p> <p>2 So the website, though, is not</p> <p>3 something that you send affirmatively to future</p> <p>4 potential employers, correct?</p> <p>5 A. Well, when they Google you and you</p> <p>6 come up --</p> <p>7 MR. CARSON: The question is, do</p> <p>8 you send the website to potential</p> <p>9 employers?</p> <p>10 THE DEPONENT: Sometimes.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Okay. Fair enough.</p> <p>13 I'm just going to ask the</p> <p>14 questions.</p> <p>15 Do you believe your resume is an</p> <p>16 accurate representation of your work history?</p> <p>17 A. Of my work history and my</p> <p>18 capability, correct.</p> <p>19 Q. Correct.</p> <p>20 So then it's, at least in your</p> <p>21 opinion, it's fair and accurate to describe</p> <p>22 yourself as the Director of Communications to a</p> <p>23 future employer?</p> <p>24 MR. CARSON: Objection.</p>	<p>Page 203</p> <p>1 answer though. Object to form.</p> <p>2 THE DEPONENT: No. Because I did</p> <p>3 the work of a Director of Communications.</p> <p>4 However, I didn't have the --</p> <p>5 the -- what is it called? The -- how do</p> <p>6 I explain this?</p> <p>7 Like the capability to make</p> <p>8 executive decisions. However -- or be --</p> <p>9 or get a salary increase. Whatever.</p> <p>10 But I did operate in that capacity</p> <p>11 as the only person in the whole office</p> <p>12 who was doing communications.</p> <p>13 So while -- and here's the other</p> <p>14 thing. And it's not misleading, because</p> <p>15 when it's on the website as that and I</p> <p>16 would -- what would I have put as my</p> <p>17 title, right?</p> <p>18 Because I didn't -- then I had</p> <p>19 zero title. So I would just write Middle</p> <p>20 East Forum with no title?</p> <p>21 Like that was the agreed upon</p> <p>22 title to the outside world, even though I</p> <p>23 did not have the authority that a normal</p> <p>24 Director of Communications would have,</p>

<p style="text-align: right;">Page 204</p> <p>1 yet I was the only one doing</p> <p>2 communications in the office.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Okay. So if I understand you</p> <p>5 correctly, they gave you the title externally.</p> <p>6 You were doing the work of a communications</p> <p>7 director.</p> <p>8 A. Uh-huh.</p> <p>9 Q. You gained the experience of a</p> <p>10 communications director.</p> <p>11 A. Correct.</p> <p>12 Q. You thought you were entitled to</p> <p>13 use the title communications director to the</p> <p>14 outside world, including on resumes, and yet your</p> <p>15 testimony is that you believed that it was</p> <p>16 nevertheless a fake title?</p> <p>17 MR. CARSON: Objection.</p> <p>18 Argumentative.</p> <p>19 THE DEPONENT: You're</p> <p>20 mischaracterizing fake title.</p> <p>21 What I'm saying is, I have an</p> <p>22 e-mail from Daniel that says, you will,</p> <p>23 to the outside world, be the Director of</p> <p>24 Communications, yet internally, we know</p>	<p style="text-align: right;">Page 206</p> <p>1 lack of three employees.</p> <p>2 Q. Were you supervising Delaney</p> <p>3 Yonchek in your role doing communications for</p> <p>4 Middle East Forum?</p> <p>5 A. Part of the time. And then Marnie</p> <p>6 was part of the time.</p> <p>7 Q. Just so we're clear, you are the</p> <p>8 Director of Communications in your current role</p> <p>9 now, correct?</p> <p>10 A. Correct.</p> <p>11 Q. Do you think that listing the fact</p> <p>12 that you were Director of Communications for the</p> <p>13 Middle East Forum on your resume helped you get</p> <p>14 that job?</p> <p>15 MR. CARSON: I'm just going to</p> <p>16 object.</p> <p>17 I don't even know where you're</p> <p>18 going with this line of questioning.</p> <p>19 She can answer your question. I'm</p> <p>20 going to object to the form. I'm going</p> <p>21 to object based on the fact that it seems</p> <p>22 like all you're trying to do is embarrass</p> <p>23 her and ridicule her and suggest that she</p> <p>24 lied to her current employer.</p>
<p style="text-align: right;">Page 205</p> <p>1 that that is just -- I forget what his</p> <p>2 exact words were. But it's in an e-mail.</p> <p>3 That was just -- that it's just</p> <p>4 for outside world purposes only. You</p> <p>5 have no authority in this organization.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Did you get a bonus as a result of</p> <p>8 your --</p> <p>9 A. I did not get a bonus for being</p> <p>10 the Director of Communication.</p> <p>11 Everybody there received a bonus</p> <p>12 and the bonus was received after that time I told</p> <p>13 you I talked to Daniel Pipes and I said, the</p> <p>14 staff is concerned that Greg Roman is still</p> <p>15 influencing all the decisions and making all the</p> <p>16 decisions.</p> <p>17 And with Matt leaving and Stacy</p> <p>18 gone and Greg nowhere to be found, and you</p> <p>19 swimming around in administrative work, I said,</p> <p>20 everybody is taking on extra responsibility and</p> <p>21 extra workload.</p> <p>22 And then Daniel Pipes' resolution</p> <p>23 to that was to give everyone a bonus for the</p> <p>24 extra work that they were picking up from the</p>	<p style="text-align: right;">Page 207</p> <p>1 I'm considering telling her not to</p> <p>2 answer the question. She's allowed to</p> <p>3 answer this one.</p> <p>4 MR. CAVALIER: Actually, she is</p> <p>5 suggesting the exact opposite. But if</p> <p>6 you can answer the question.</p> <p>7 MR. CARSON: You can answer the</p> <p>8 question.</p> <p>9 THE DEPONENT: The thing that I</p> <p>10 did was, when I interviewed with Car</p> <p>11 McMichael for the Director of</p> <p>12 Communications position, I explained to</p> <p>13 her exactly all of this. All of this.</p> <p>14 I explained to her what I did,</p> <p>15 what it was, the authority I had, the</p> <p>16 authority I didn't have.</p> <p>17 So they were very aware of what it</p> <p>18 was. The reason that I actually got that</p> <p>19 job is because I was very good to my</p> <p>20 previous intern that works in Fred</p> <p>21 Upton's office and she passed along my</p> <p>22 resume.</p> <p>23 And they had been interviewing</p> <p>24 Communication Directors for like three</p>

<p>1 months. And the boss said he liked my 2 passion. 3 So, no, the title had nothing to 4 do with it. My passion did. 5 BY MR. CAVALIER: 6 Q. Well, you don't know that the 7 title had nothing to do with it, right? 8 I mean, I'm not just talking 9 about the title. 10 What I'm saying to you is this. 11 You just said to me, I explained everything about 12 the title and my duties as Director of 13 Communications for the Middle East Forum, 14 correct, that's what you said? 15 A. I explained that to Car McMichael, 16 yes. 17 Q. And yet they hired you, correct? 18 A. Correct. Because I -- because I 19 was capable of doing the work. Not because just 20 because I had -- 21 MR. CARSON: The question was, did 22 they hire you? Yes or no. 23 THE DEPONENT: Yes. But it had 24 nothing to do --</p>	<p>Page 208</p> <p>1 legitimately the Director of Communications for 2 the Middle East Forum? 3 MR. CARSON: Object to form. You 4 can answer the question. 5 THE DEPONENT: No. 6 BY MR. CAVALIER: 7 Q. No? 8 Despite all that, when you were 9 Director of Communications for Middle East Forum 10 form, that was a fake title. But now you're 11 Director of Communications -- 12 MR. CARSON: How many times are we 13 going to go through this? 14 BY MR. CAVALIER: 15 Q. -- for Congressman Weber and 16 that's a real thing? 17 A. Correct. 18 MR. CARSON: Objection. She's 19 explained to you that the reason for her 20 testimony is because it's an e-mail she 21 received from Daniel Pipes where he told 22 her you're not really the Director of 23 Communications. 24 MR. CAVALIER: Okay. I just want</p> <p>Page 210</p>
<p>1 MR. CARSON: That's just it. 2 Done. Next question. 3 BY MR. CAVALIER: 4 Q. Right. 5 They hired you. And they made you 6 Director of Communications, correct? 7 MR. CARSON: Yes or no. 8 THE DEPONENT: Yes. 9 BY MR. CAVALIER: 10 Q. So why are you so insistent on 11 calling this a hollow title at the Middle East 12 Forum, if you put it on your resume and you did 13 the responsibilities, you did the job, and it got 14 you another job as the Director of 15 Communications? 16 MR. CARSON: I'm going to object. 17 Why don't you read the counterclaims that 18 you filed against her? 19 I'm going to object based on form, 20 calls for a legal conclusion. And she 21 can answer the question. 22 THE DEPONENT: I don't know. 23 BY MR. CAVALIER: 24 Q. Isn't it fair to say that you were</p> <p>Page 209</p>	<p>1 to make it clear. I just didn't 2 understand why you were -- 3 MR. CARSON: Well, it's because of 4 the counterclaims you guys filed. 5 BY MR. CAVALIER: 6 Q. All right. Back to the exhibit 7 you have on your screen. 8 MR. CARSON: You guys are accusing 9 her of a breach of fiduciary duty. She 10 never had a fiduciary duty. She was a 11 secretary. 12 BY MR. CAVALIER: 13 Q. Do you believe that you never had 14 a fiduciary duty to the Middle East Forum? 15 MR. CARSON: Objection. Calls for 16 a legal conclusion. 17 Do you even know what a fiduciary 18 duty is, Lisa? 19 THE DEPONENT: Well, I did have a 20 real estate license at one point. So, 21 yes, I do know what a fiduciary duty is. 22 And, no, I did not have a 23 fiduciary duty to the Middle East Forum. 24 However, I will say as an employee</p> <p>Page 211</p>

<p>1 of an organization, people have some</p> <p>2 moral responsibilities.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Did you have a duty of loyalty to</p> <p>5 the Middle East Forum?</p> <p>6 MR. CARSON: Objection. Calls for</p> <p>7 a legal conclusion.</p> <p>8 Do you know what a duty of loyalty</p> <p>9 is?</p> <p>10 THE DEPONENT: I do not what a</p> <p>11 duty of loyalty is.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Do you feel like you had an</p> <p>14 obligation to be truthful with the Middle East</p> <p>15 Forum about things pertaining to your employment?</p> <p>16 A. I believe I have an obligation to</p> <p>17 be truthful at all times, so that would include</p> <p>18 at work.</p> <p>19 Q. Okay. I'm gonna direct you back</p> <p>20 to the exhibit we have up on the screen.</p> <p>21 A. Uh-huh.</p> <p>22 Q. What is this message here that's</p> <p>23 dated May 30th, 2019?</p> <p>24 A. It appears to be a picture.</p>	<p>Page 212</p> <p>1 the objection on the record.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Did you have a sexual relationship</p> <p>4 with Ben Baird in or around May of 2019?</p> <p>5 MR. CARSON: I'm gonna object.</p> <p>6 Objection based on the question is</p> <p>7 designed to embarrass and harass.</p> <p>8 There's Federal Rules of Civil</p> <p>9 Procedure that provide my client's sexual</p> <p>10 proclivities are not admissible and,</p> <p>11 therefore, this question can only be</p> <p>12 embarrassing.</p> <p>13 Based on that, I'm gonna instruct</p> <p>14 her not answer the question. I'm gonna</p> <p>15 continue these objections. And I'll just</p> <p>16 note the prior objection from here on in.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. I'm going to read you a quote from</p> <p>19 your prior deposition and I want you to tell me</p> <p>20 if it's true or false.</p> <p>21 Quote, the only reason that I had</p> <p>22 sex with anybody was because the Middle East</p> <p>23 Forum damaged my freakin emotional state, end</p> <p>24 quote.</p>
<p>1 Q. Right.</p> <p>2 And as we established it's a</p> <p>3 picture of Ben Baird sleeping in what appears to</p> <p>4 be in a hotel room.</p> <p>5 A. I don't know if he was sleeping.</p> <p>6 Probably just relaxing, but yeah.</p> <p>7 Q. Okay. And just, again, we don't</p> <p>8 have to belabor this point. But you, for a</p> <p>9 period of time, in or about May of 2019,</p> <p>10 maintained a sexual relationship with Ben Baird,</p> <p>11 correct?</p> <p>12 MR. CARSON: I'm going to object</p> <p>13 to the question and direct her not to</p> <p>14 answer it.</p> <p>15 THE DEPONENT: I don't know if I</p> <p>16 maintained a sexual relationship --</p> <p>17 MR. CARSON: You don't have to</p> <p>18 answer the question.</p> <p>19 THE DEPONENT: I don't know</p> <p>20 actually.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Did you sexual --</p> <p>23 MR. CARSON: You can ask the</p> <p>24 question. Ask the question and I'll get</p>	<p>Page 213</p> <p>1 Is that a true statement?</p> <p>2 MR. CARSON: Objection. You can</p> <p>3 answer whether or not that's true.</p> <p>4 THE DEPONENT: That is something</p> <p>5 that I believed -- yeah, that is</p> <p>6 something I believed. Yes.</p> <p>7 I think that MEF really put my</p> <p>8 mental state in a downward spiral. And I</p> <p>9 was, you know, unfortunately, looking for</p> <p>10 self-validation and worth through things</p> <p>11 that were unhealthy.</p> <p>12 MR. CAVALIER: Counsel, it's</p> <p>13 clearly a relevant question. So I'm</p> <p>14 going to ask it again.</p> <p>15 MR. CARSON: It does not become</p> <p>16 relevant because of that quote.</p> <p>17 MR. CAVALIER: It does.</p> <p>18 MR. CARSON: My client's --</p> <p>19 MR. CAVALIER: I'm going to ask</p> <p>20 the question again. And if you instruct</p> <p>21 her not to answer, we're going to call</p> <p>22 the Judge.</p> <p>23 MR. CARSON: Okay. We can do that</p> <p>24 then. Let's call.</p>
<p>Page 214</p>	<p>Page 215</p>



<p style="text-align: right;">Page 216</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. The question is very simply, and</p> <p>3 again, you've already spoken about this in your</p> <p>4 prior deposition. I just want to make it clear</p> <p>5 for the transcript.</p> <p>6 Did you or did you not maintain a</p> <p>7 sexual relationship for some period of time with</p> <p>8 Ben Baird in or around May of 2019?</p> <p>9 MR. CARSON: I'm going to</p> <p>10 object --</p> <p>11 THE DEPONENT: You keep adding a</p> <p>12 date to it and I'm telling you, I don't</p> <p>13 know. Because there were times where I</p> <p>14 hung out with Ben Baird and I didn't</p> <p>15 sleep with him.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Okay. Then I'm asking, because --</p> <p>18 A. I don't know the dates.</p> <p>19 If you want to ask me if I've ever</p> <p>20 maintained a sexual relationship with Ben Baird,</p> <p>21 yes.</p> <p>22 MR. CARSON: Lisa, wait. Wait.</p> <p>23 Let's do this right in the order.</p> <p>24 We're not just screaming --</p>	<p style="text-align: right;">Page 218</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. The circumstances -- this</p> <p>3 wasn't -- you're not in the office when this</p> <p>4 photograph was taken, right?</p> <p>5 A. Nor was I probably at work when</p> <p>6 that photograph --</p> <p>7 Q. I agree.</p> <p>8 That's all I'm trying to figure</p> <p>9 out is the context in which you took this</p> <p>10 photograph.</p> <p>11 A. I don't even know, because there</p> <p>12 were times I hung out with Ben Baird in a hotel</p> <p>13 room where I didn't sleep with. So I don't know,</p> <p>14 if that's what you're implying.</p> <p>15 I don't know if I slept with him</p> <p>16 that time.</p> <p>17 MR. CARSON: Lisa, listen to the</p> <p>18 question.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. That's fine. I'm not asking you</p> <p>21 that.</p> <p>22 I'm just asking whether you</p> <p>23 understand or know, as we sit here today, what</p> <p>24 prompted this photograph.</p>
<p style="text-align: right;">Page 217</p> <p>1 THE DEPONENT: All right. Go in</p> <p>2 the right order.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Yeah, I didn't ask a question, but</p> <p>5 that's fine.</p> <p>6 The only reason I care about the</p> <p>7 date, is I'm trying to understand the context of</p> <p>8 this photograph.</p> <p>9 Do you recall what -- what, where</p> <p>10 or how it came about that you took a photograph</p> <p>11 of Ben Baird in what appears to be the bed of a</p> <p>12 hotel room on or about May 30th, 2019?</p> <p>13 Well, you can see from --</p> <p>14 MR. CARSON: Object to form. What</p> <p>15 is that -- what are you asking her? How,</p> <p>16 where or when, is that three questions?</p> <p>17 MR. CAVALIER: I'm asking her to</p> <p>18 describe the circumstances of this</p> <p>19 photograph.</p> <p>20 MR. CARSON: It looks like she</p> <p>21 took a picture.</p> <p>22 What do you mean the</p> <p>23 circumstances?</p> <p>24</p>	<p style="text-align: right;">Page 219</p> <p>1 A. And three times I said I don't</p> <p>2 know.</p> <p>3 Q. Okay.</p> <p>4 Did he know you took the</p> <p>5 photograph?</p> <p>6 A. Yes.</p> <p>7 Q. At the time?</p> <p>8 A. Yes.</p> <p>9 MR. CARSON: Lisa, don't guess.</p> <p>10 Do you know whether he --</p> <p>11 THE DEPONENT: I know that he did.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Okay. Did he know --</p> <p>14 A. Because I said, look how cute you</p> <p>15 look.</p> <p>16 Q. Okay. I'm gonna take down Exhibit</p> <p>17 B and go back to Exhibit A.</p> <p>18 A. I think I even sent him a copy of</p> <p>19 the picture.</p> <p>20 Q. Well, if you did, you haven't</p> <p>21 produced that to us, so I will ask you to do</p> <p>22 that.</p> <p>23 A. I said if I did. I might have</p> <p>24 even is what I said.</p>

<p>Page 220</p> <p>1 MR. CARSON: You have every 2 message she's ever sent. 3 What are you talking about? 4 MR. CAVALIER: I don't have that 5 one. 6 MR. CARSON: Let me put it like 7 this. There are no messages Lisa has 8 that we haven't sent you. 9 MR. CAVALIER: We don't have the 10 Facebook messages. 11 THE DEPONENT: Yes, you do. 12 MR. CARSON: Lisa, stop. 13 When I would -- when you say -- 14 you asked us to please send us that, the 15 answer is, we cannot send you anything 16 else, because there's no other evidence 17 in existence that we can possibly get our 18 hands on that you -- that we have that 19 you don't have. 20 MR. CAVALIER: She volunteered 21 that she may have even sent it to Ben. 22 All I'm saying is, if she did, we 23 didn't get it. 24 So if it exists --</p>	<p>Page 222</p> <p>1 you can derive the context then. 2 A. Okay. That will be helpful. 3 Q. Why don't you take a minute and 4 I'm going to take you to the top of the 5/30 5 messages. 6 You can take a look. Let me know 7 when I need to scroll. 8 A. Okay. 9 Q. Just for the record, you're 10 talking about work here, right? Did you not send 11 Delaney articles? 12 A. Correct. 13 I thought that it was tomorrow 14 that I was telling them. I don't know what that 15 means. 16 Okay. 17 No, I'm sorry. 18 Okay. 19 Well, good. I didn't realize 20 until now. 21 My bad. I was gonna do them on 22 the flight, but, of course, wifi was out. 23 Okay. 24 Daniel Pipes already hates me and</p>
<p>Page 221</p> <p>1 MR. CARSON: If she sent it, you 2 would have gotten it. 3 MR. CAVALIER: Okay. 4 MR. CARSON: Never in my life have 5 I seen such broad discovery. 6 You guys still complain. It's 7 hilarious. 8 BY MR. CAVALIER: 9 Q. Why did you send this photograph 10 to Delaney Yonchek? 11 A. I don't remember. 12 Q. What possible reason could you 13 have had to send this photo Delaney Yonchek? 14 A. I'm not going to speculate on my 15 reason from something that happened in 2019. 16 I don't know if there was a 17 context behind it. I don't know if we had a 18 conversation before. I don't remember. 19 Q. Was there anything in this text 20 chain that would give you any idea what the 21 context was? 22 A. It says, that was fast. You won't 23 believe where I am. 24 Q. Scroll up and look at it. See if</p>	<p>Page 223</p> <p>1 I'm drunk, so, okay, yeah. 2 Oh, boy. 3 Okay. 4 Okay. 5 Okay. 6 BY MR. CAVALIER: 7 Q. She's asking you here, just again 8 for the record, to bring up her salary to Greg 9 and Daniel Pipes. 10 Is she looking for a raise or 11 something at that point? 12 A. Probably. I mean, everybody 13 asked -- everybody there was, like, always afraid 14 to go to Greg and Daniel about everything. 15 And so I got asked to talk to 16 people about -- a lot about stuff. All kinds of 17 stuff. 18 Q. All right. And you were, at least 19 in part, supervising her at this point, so it 20 makes sense for her to go to you about her salary 21 concerns, correct? 22 A. Like I said, everybody went to me 23 to get messages to them. 24 Q. Right. I understand that.</p>

<p>Page 224</p> <p>1 But at least with respect to</p> <p>2 Delaney, she was reporting, at least in part, to</p> <p>3 you at this point, so it makes sense for her to</p> <p>4 say, hey, I got a salary concern?</p> <p>5 A. If you think it makes sense, then</p> <p>6 it makes sense.</p> <p>7 Q. Was she, in fact, reporting to you</p> <p>8 at this point in time?</p> <p>9 A. Partially. It could have made</p> <p>10 sense for her to go to Marnie or Greg herself.</p> <p>11 He was her supervisor.</p> <p>12 Technically she reported directly</p> <p>13 to him, but --</p> <p>14 Okay.</p> <p>15 Okay.</p> <p>16 Okay.</p> <p>17 Okay.</p> <p>18 Q. So now we're back to the relevant</p> <p>19 piece.</p> <p>20 I'm assuming here you say, that</p> <p>21 was fast, you won't believe where I am, referring</p> <p>22 to the fact that you're with Ben, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. And then she says, there</p>	<p>Page 226</p> <p>1 A. Not normally, but there was no</p> <p>2 implication about sex there.</p> <p>3 There were times we'd talk about</p> <p>4 her sex life, but --</p> <p>5 Q. Pardon me?</p> <p>6 A. There were times -- I mean,</p> <p>7 friends talk about things, all kinds of things</p> <p>8 when they're outside of work but there were</p> <p>9 times.</p> <p>10 I think there were times where we</p> <p>11 both talked about each other. She had a bad</p> <p>12 hinge date where it turned out three dates in</p> <p>13 that the person was a transvestite and she didn't</p> <p>14 know what to do and how to do anything about it.</p> <p>15 So, like, you know, things happen</p> <p>16 in life.</p> <p>17 Q. Okay. Just to be clear though, I</p> <p>18 mean, you're not denying that this photograph</p> <p>19 that you sent to Delaney Yonchek of Ben Baird</p> <p>20 appearing to be asleep in a hotel room bed was</p> <p>21 entirely free of any sexual connotation, correct?</p> <p>22 A. I actually -- if I'm correct, I</p> <p>23 think this is from the National Conservative</p> <p>24 Conference. Because I was off that day. And I</p>
<p>Page 225</p> <p>1 were only six of them -- there were only six and</p> <p>2 two of them were obvious skips, referring to what</p> <p>3 you were talking about work-related above,</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. And she says, where, answering</p> <p>7 your question about where you are.</p> <p>8 A. Okay.</p> <p>9 Q. Okay?</p> <p>10 Then you send a picture.</p> <p>11 A. Okay.</p> <p>12 Q. Okay. So with that added context,</p> <p>13 sitting here today, do you know why you would</p> <p>14 have sent Delaney Yonchek a picture of Ben Baird</p> <p>15 asleep in a hotel room?</p> <p>16 A. I clearly said, do you know where</p> <p>17 I am, so I clearly wanted her to know that I was</p> <p>18 with Ben.</p> <p>19 Q. Why would you have wanted her to</p> <p>20 know that you were with Ben?</p> <p>21 A. I have no idea. Probably because</p> <p>22 we're friends and we talk about stuff.</p> <p>23 Q. Okay. Do you talk about your sex</p> <p>24 life at all?</p>	<p>Page 227</p> <p>1 was trying to make sure that the articles were</p> <p>2 going out, if I'm not mistaken.</p> <p>3 And I actually didn't sleep with</p> <p>4 him on this event. Now, did we hang out and was</p> <p>5 I in his hotel room when we went back in between</p> <p>6 things to like relax after we ate and stuff?</p> <p>7 Yeah.</p> <p>8 But I didn't sleep with him at</p> <p>9 that conference, number one.</p> <p>10 Number two, yeah, like -- I think</p> <p>11 that's when this was. If I looked up the date of</p> <p>12 the National Conservative Conference from 2019, I</p> <p>13 think that's what this was.</p> <p>14 Q. Okay. But with that said, I mean,</p> <p>15 you're sending this to Delaney Yonchek without</p> <p>16 any of the context that you just gave me.</p> <p>17 Do you think it would be fair for</p> <p>18 Delaney Yonchek to receive it and assume that</p> <p>19 there was a sexual context to it?</p> <p>20 A. Delaney Yonchek would not assume</p> <p>21 stuff like that. I think she would just find it</p> <p>22 funny that I was hanging out with Ben Baird,</p> <p>23 because she used to think that Ben Baird was</p> <p>24 attractive.</p>

<p style="text-align: right;">Page 228</p> <p>1 Q. Okay. So, again, I want to be 2 very clear about this. 3 Your testimony here is that 4 sending this photograph of Ben Baird asleep or 5 apparently asleep in what appears to be a hotel 6 room bed was just to show Delaney that you were 7 hanging out with a buddy? 8 A. Correct. 9 Q. Who you also happened to have a 10 sexual relationship with at some point in time? 11 MR. CARSON: I'm gonna object 12 based on before, but you can say yes or 13 no to it. 14 THE DEPONENT: Correct. But I'm 15 not here to, like, judge what Delaney's 16 inference was. 17 BY MR. CAVALIER: 18 Q. I'm not asking you to judge what 19 Delaney's inference was. 20 I'm asking you to tell me about 21 the context, or lack thereof, in which this photo 22 was sent? 23 A. Which I just did. 24 Q. So you don't think this text</p>	<p style="text-align: right;">Page 230</p> <p>1 for the record that I have absolutely no 2 idea what Rape Shield laws have to do 3 with this civil lawsuit, but -- 4 MR. CARSON: Well, what they have 5 to do is read the Federal Rules of Civil 6 Procedure, which provide that in a civil 7 or criminal case, you cannot make the 8 witness' sexual proclivities -- you can't 9 use that as evidence. That's what Rape 10 Shield is. 11 MR. CAVALIER: Again, I'll say for 12 the record that you can't introduce it as 13 evidence out of the blue, but when the 14 witness claims that all of her sexual -- 15 THE DEPONENT: I didn't say all. 16 MR. CAVALIER: -- communications 17 were directly caused by the defendant in 18 the lawsuit, they are relevant. 19 But in any event, I'll withdraw -- 20 MR. CARSON: You don't get to 21 decide thought that legally, do you? 22 MR. CAVALIER: I agree with you 23 and neither do you. 24 MR. CARSON: No, actually we are</p>
<p style="text-align: right;">Page 229</p> <p>1 message to Delaney has any sexual undertones or 2 context or anything? 3 A. If somebody sent that to me -- 4 MR. CARSON: Wait, wait, Lisa. 5 Let me just say this. 6 THE DEPONENT: No. 7 MR. CARSON: So I'm going to 8 object based on the fact that that 9 question -- I'm going to object based on 10 the objection that this question has now 11 been asked and answered about five times. 12 I think we're belaboring the 13 point, to say the least, over a totally 14 inconsequential fact that will never see 15 the light of a courtroom, that is totally 16 irrelevant, that is protected by Rape 17 Shield and is just designed to embarrass 18 and harass. 19 So, you know, I think we should 20 probably move from the Benjamin Baird 21 photo. 22 But, you know, you can answer the 23 last question, I guess. 24 MR. CAVALIER: I'll just only note</p>	<p style="text-align: right;">Page 231</p> <p>1 the ones that get to decide that. That's 2 exactly what we get to decide. It's 3 totally within our realm of control what 4 we present as evidence. 5 THE DEPONENT: Anyway, can we 6 proceed? 7 MR. CAVALIER: I'll leave that to 8 the Judge to decide. 9 BY MR. CAVALIER: 10 Q. But in any event, do you think 11 Delaney Yonchek could have been uncomfortable 12 receiving this photo from you? 13 A. No. 14 Q. You don't think that's a 15 possibility? Why not? Why not? 16 A. Because I don't. 17 Q. You're her supervisor sending her 18 a photograph of a sleeping half-dressed man in a 19 bed. 20 A. He's not half-dressed. 21 Q. Okay. He's wearing an undershirt. 22 MR. CARSON: Well, you can see 23 he's wearing a shirt. He's wearing 24 pants. That makes him fully dressed.</p>



<p style="text-align: right;">Page 232</p> <p>1 So objection to form, assuming</p> <p>2 facts not in evidence.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Strike the question.</p> <p>5 The question is, do you think it</p> <p>6 was appropriate to send her this photograph?</p> <p>7 A. I don't think it was</p> <p>8 inappropriate.</p> <p>9 Q. Okay. Did you know that Delaney</p> <p>10 Yonchek was deposed the other day in this case?</p> <p>11 A. Sure.</p> <p>12 Q. Do you know she testified --</p> <p>13 A. I knew she was being deposed. I</p> <p>14 didn't know she was. Like, I knew she was going</p> <p>15 to be deposed. But I didn't know when or that it</p> <p>16 happened already.</p> <p>17 Q. Do you know that she testified</p> <p>18 during this deposition?</p> <p>19 A. No, I did not know that.</p> <p>20 MR. CARSON: I'm going to object.</p> <p>21 The answer is, did you know?</p> <p>22 THE DEPONENT: No, I did not know.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Now that you know, do you regret</p>	<p style="text-align: right;">Page 234</p> <p>1 THE VIDEOGRAPHER: The time is</p> <p>2 2:23 p.m. We are off the record.</p> <p>3 (Lunch recess.)</p> <p>4 THE VIDEOGRAPHER: The time is</p> <p>5 2:58 and we are back on the record.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. I'm gonna put Exhibit A back up on</p> <p>8 the screen.</p> <p>9 Can you see that document?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So I just want to run you</p> <p>12 through briefly the rest of these -- the rest of</p> <p>13 this text message chain with Delaney.</p> <p>14 So you send the picture. She then</p> <p>15 says, oh my God, that's why you're in D.C. You</p> <p>16 say, I had a train home for 3:55. I missed it.</p> <p>17 Hence the drinking.</p> <p>18 She then asks, ha, ha, is he still</p> <p>19 as obsessed with you?</p> <p>20 Do you know what she meant by</p> <p>21 that?</p> <p>22 A. He had a crush on me.</p> <p>23 MR. CARSON: Object to the form.</p> <p>24 Opinion testimony.</p>
<p style="text-align: right;">Page 233</p> <p>1 send thing the photo?</p> <p>2 A. Of course. I don't know why she</p> <p>3 would have thought that though, so I'm a little</p> <p>4 miffed. But I am -- I'm sorry that she did say</p> <p>5 that feel way.</p> <p>6 Q. Did you ever send photos of this</p> <p>7 type -- of this type, I mean of men who you had a</p> <p>8 relationship with to other MEF employees?</p> <p>9 A. Probably not, no. Maybe Tricia.</p> <p>10 Me and Tricia shared -- we talked about a lot.</p> <p>11 But I don't think so. I don't know. Maybe.</p> <p>12 Q. Do you think this was a violation</p> <p>13 of MEF policy?</p> <p>14 A. Sending a picture of a man? No.</p> <p>15 MR. CAVALIER: How long have we</p> <p>16 been going for, Seth? Want to take five?</p> <p>17 MR. CARSON: Yeah, that's fine.</p> <p>18 MR. CAVALIER: All right. Why</p> <p>19 don't we just take five.</p> <p>20 MR. CARSON: It's 2:30. We</p> <p>21 started around 10:10.</p> <p>22 MR. CAVALIER: Do you want to take</p> <p>23 lunch -- do you want to take a legitimate</p> <p>24 lunch break?</p>	<p style="text-align: right;">Page 235</p> <p>1 THE DEPONENT: I don't know what</p> <p>2 she meant. But he had a crush on me, so</p> <p>3 that's what I assumed she meant.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Okay. So you had talked about his</p> <p>6 crush on you before, correct?</p> <p>7 A. Well, I didn't talk about it</p> <p>8 before. I mean, he was clear and he told people</p> <p>9 at the Middle East Forum Gala that he had a crush</p> <p>10 on me. Multiple people. Not just me. So...</p> <p>11 Q. So sitting here today, before May</p> <p>12 30th of 2019, do you know whether or not you</p> <p>13 discussed Ben Baird's crush on you with Delaney</p> <p>14 Yonchek?</p> <p>15 A. I don't know.</p> <p>16 Q. Okay. And you respond yes, wants</p> <p>17 to have babies with me. I'm assuming that's you</p> <p>18 acknowledging the fact that he does, indeed, have</p> <p>19 a crush on you?</p> <p>20 A. Correct, he did.</p> <p>21 Q. She says, shut up.</p> <p>22 You say, not kidding. It's not</p> <p>23 happening.</p> <p>24 I'm assuming the fact that he</p>

<p>1 wanted to have babies with you -- well, I'll ask 2 the question. Strike all that. 3 Wants to have babies with you. 4 Was that literal? 5 A. No, I -- 6 MR. CARSON: Objection. You can 7 answer. 8 THE DEPONENT: It was clearly 9 figurative. That's why I said it's not 10 happening. 11 BY MR. CAVALIER: 12 Q. Okay. But just to be clear, I 13 mean, we're talking it was figurative on his part 14 as well. 15 I mean, obviously you're being 16 figurative here, but at least as far as you know, 17 Ben Baird never actually did want to have 18 children with you, correct? 19 A. I mean, he pretty much told me he 20 was in love with me. So I don't know. 21 Q. Okay. Delaney says, yikes. 22 You say, have a good vacation. 23 And then she asks you, does he 24 know this is just a fun-type-of-deal with him,</p>	<p>Page 236</p>	<p>1 then she wouldn't have needed to ask whether it 2 was just-for-fun-type of deal, correct? 3 MR. CARSON: Objection. 4 Argumentative. Object to form. 5 THE DEPONENT: Like I don't know 6 what her intent of that was. You know 7 what I mean? 8 Clearly, you know, like with Ben, 9 it was -- he was falling for me 10 definitely harder than I was interested 11 in him at the time. 12 BY MR. CAVALIER: 13 Q. Right. 14 And so she's referencing something 15 that she knows about, whether it was a discussion 16 with you, a discussion -- 17 A. That's his assumption. That's not 18 fact. 19 Q. Whose assumption? 20 A. Yours. 21 Q. Well, I'm asking you -- okay, so 22 how did you interpret this comment? 23 A. I just told you, I don't know. 24 MR. CARSON: I'm just going to put</p>	<p>Page 238</p>
<p>1 correct? 2 A. Yeah. 3 Q. She's referring there to your 4 sexual relationship with Ben Baird, right? 5 MR. CARSON: Objection. Again, 6 you're asking her opinion on what Delaney 7 meant. You can answer if you know. 8 THE DEPONENT: First of all, I 9 don't know if she's talking about the 10 sexual part or friendship or what. 11 But at that point, I had stopped 12 sleeping with him, so it's clear that it 13 says it's not happening. 14 BY MR. CAVALIER: 15 Q. Well, it says it's not happening 16 above, the fact -- the comment about having 17 babies with you, it's not happening? 18 A. Right. It's not happening. 19 Q. But the question is, here -- I 20 mean -- 21 A. I don't know what she meant by 22 that. If you want to keep going, we'll see. 23 Q. If she was just asking you, is 24 this just a buddy-buddy relationship with Ben,</p>	<p>Page 237</p>	<p>1 the same objection on the record. You're 2 asking her opinion about what someone 3 else meant. 4 BY MR. CAVALIER: 5 Q. Does it make sense to you that if 6 Delaney understood your relationship with Ben 7 Baird to be one of friendship, she would ask 8 whether it was a just-for-fun-type of deal with 9 him? 10 MR. CARSON: Object to the form of 11 the question. 12 THE DEPONENT: I don't know about 13 you, but I had fun with my friends. 14 BY MR. CAVALIER: 15 Q. Right. 16 But do you have friends that ask 17 you whether you have fun with your friends? 18 MR. CARSON: Objection. 19 THE DEPONENT: Yeah. 20 BY MR. CAVALIER: 21 Q. You have friends that ask you 22 whether -- 23 A. Do you know how guys that are in 24 my life that I'm friends with and do want to have</p>	<p>Page 239</p>

<p style="text-align: right;">Page 240</p> <p>1 a relationship with me and then people say, well,</p> <p>2 like, are you just friends with him or does he</p> <p>3 know that you're just, like, here to have fun and</p> <p>4 not, like, whatever. And I don't sleep with</p> <p>5 them.</p> <p>6       There's a ton. That happens quite</p> <p>7 often actually.</p> <p>8       Q. Right. But she's not saying --</p> <p>9       A. That's your assumption.</p> <p>10       Q. Yeah. But she's not saying here,</p> <p>11 does he know that you're not gonna sleep with</p> <p>12 him.</p> <p>13       A. Do you know that's not what she</p> <p>14 was saying? Because I don't.</p> <p>15       Q. Well, I know what she said.</p> <p>16       MR. CARSON: The document speaks</p> <p>17 for itself. So let's move on.</p> <p>18       THE DEPONENT: Yeah, what do you</p> <p>19 want to know? I don't know what her</p> <p>20 assumption was. I did not know what she</p> <p>21 meant. I don't know.</p> <p>22       Go back up to what it said.</p> <p>23       Excuse me, you're scrolling too</p> <p>24 fast. You want me -- I said I don't know</p>	<p style="text-align: right;">Page 242</p> <p>1 did.</p> <p>2       THE DEPONENT: I thought we just</p> <p>3 said that I said in there, I don't know</p> <p>4 what he knows.</p> <p>5       And clearly I wasn't interested,</p> <p>6 at that time, in pursuing a full-time</p> <p>7 committed relationship with him.</p> <p>8 BY MR. CAVALIER:</p> <p>9       Q. We're not talking about a</p> <p>10 full-time committed relation.</p> <p>11       A. I don't know what you're talking</p> <p>12 about, because this is the stupidest text message</p> <p>13 I've ever read.</p> <p>14       Q. Well, it's your text message</p> <p>15 thread.</p> <p>16       MR. CARSON: What's the relevance</p> <p>17 of any of this?</p> <p>18       THE DEPONENT: I don't know.</p> <p>19 BY MR. CAVALIER:</p> <p>20       Q. The relevance is I'm trying to ask</p> <p>21 you whether or not sitting here today, and under</p> <p>22 oath, your testimony is that you're not aware of</p> <p>23 whether Delaney Yonchek knew or did not know you</p> <p>24 were engaged in a sexual relationship with Ben</p>
<p style="text-align: right;">Page 241</p> <p>1       what he knows, because I don't.</p> <p>2 BY MR. CAVALIER:</p> <p>3       Q. Okay.</p> <p>4       A. There's my answer. I don't know</p> <p>5 what he knows, because I don't know.</p> <p>6       Q. So here you're going back talking</p> <p>7 about work, right? Forget this hell hole?</p> <p>8       A. Forget this hell hope?</p> <p>9       Q. Down here you correct yourself,</p> <p>10 hell hole.</p> <p>11       A. Oh, okay.</p> <p>12       Q. You're talking about MEF there,</p> <p>13 right?</p> <p>14       A. Probably. I'm telling her to have</p> <p>15 fun on her vacation, forget this hell hole.</p> <p>16       Q. You go back to telling her about</p> <p>17 some other casual stuff.</p> <p>18       Okay. But there's nothing in this</p> <p>19 text string where you refer to Ben Baird as just</p> <p>20 a friend, right?</p> <p>21       MR. CARSON: Objection. Do you</p> <p>22 want her to read the entire thread to</p> <p>23 confirm --</p> <p>24       MR. CAVALIER: I thought we just</p>	<p style="text-align: right;">Page 243</p> <p>1 Baird on or about May of 2019.</p> <p>2       MR. CARSON: Objection. You're</p> <p>3 asking her what Delaney may or may not</p> <p>4 know?</p> <p>5       MR. CAVALIER: Yes.</p> <p>6       MR. CARSON: Okay. Well, if she</p> <p>7 knows what Delaney knows, then she can</p> <p>8 answer.</p> <p>9       THE DEPONENT: I'll tell you this.</p> <p>10 I will tell you this.</p> <p>11       Whatever day the Middle East Form</p> <p>12 Gala was, which was prior to this,</p> <p>13 Benjamin Baird had made his interest in</p> <p>14 me known, not just to me, to a bunch of</p> <p>15 people that attended the gala.</p> <p>16       It was clearly known that he was</p> <p>17 romantically interested in me.</p> <p>18       Does this signify that she thinks</p> <p>19 it's a sexual nature? Or does she think</p> <p>20 it's a crushy thing? Or that I just like</p> <p>21 the attention? I don't know.</p> <p>22       But clearly I don't know if she</p> <p>23 thinks that I've had a sexual relation</p> <p>24 with him. I don't remember what she knew</p>

<p style="text-align: right;">Page 244</p> <p>1 or didn't know.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Okay. And just to be clear,</p> <p>4 having nothing to do with these text messages,</p> <p>5 just in general, did you ever have a discussion</p> <p>6 with Delaney Yonchek where you made it known to</p> <p>7 her that you were engaged in a sexual</p> <p>8 relationship with Ben Baird?</p> <p>9 A. I don't think I've ever said to</p> <p>10 her I had sex with Ben Baird. I don't think I</p> <p>11 did. No.</p> <p>12 Q. That wasn't the question.</p> <p>13 The question is --</p> <p>14 A. Well, then how else would it be</p> <p>15 clear?</p> <p>16 Q. Did you ever have a</p> <p>17 conversation --</p> <p>18 A. I could tell her that I went on</p> <p>19 dates with him.</p> <p>20 Does that mean I slept with him?</p> <p>21 Q. Well, that's what I'm asking you.</p> <p>22 A. I'm telling you, I do not think</p> <p>23 that I ever told her that I had sex with him</p> <p>24 ever.</p>	<p style="text-align: right;">Page 246</p> <p>1 that I do not believe from -- from these</p> <p>2 text messages and from my recollection</p> <p>3 that I ever told her that I had sexual --</p> <p>4 like an actual -- that I had sex with</p> <p>5 Benjamin Baird.</p> <p>6 She knew there was romantic</p> <p>7 interest there.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. Okay. Who's Mike Yoder to you?</p> <p>10 A. Mike Yoder, he is a lawyer and he</p> <p>11 is friends with Sidney, my friend, and he's my</p> <p>12 friend, kind of.</p> <p>13 I actually don't know Mike much,</p> <p>14 but yeah.</p> <p>15 Q. Has he ever represented you in a</p> <p>16 case?</p> <p>17 A. He has done several legal things</p> <p>18 for me.</p> <p>19 Q. Who's Patrick Sandman?</p> <p>20 A. Patrick Sandman is another lawyer</p> <p>21 friend of mine and he's also given me legal</p> <p>22 advice.</p> <p>23 Q. We'll come back to that.</p> <p>24 A. On multiple occasions.</p>
<p style="text-align: right;">Page 245</p> <p>1 Q. Did you ever say anything to her</p> <p>2 that would lead her to reasonably believe that</p> <p>3 you had sex with him?</p> <p>4 A. I don't know what she would</p> <p>5 reasonably believe or not. So I don't know.</p> <p>6 Q. Okay. Do you think, based on the</p> <p>7 conversations that you had with her, it would be</p> <p>8 fair for Delaney Yonchek to assume that you were</p> <p>9 engaged in a sexual relationship with Ben Baird</p> <p>10 at this time?</p> <p>11 MR. CARSON: I'm just going to</p> <p>12 object to the form of that question for</p> <p>13 obvious reasons.</p> <p>14 THE DEPONENT: No.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. That would not be fair if she</p> <p>17 believed that?</p> <p>18 MR. CARSON: Objection. Asked and</p> <p>19 answered.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Is that your testimony?</p> <p>22 A. My testimony is --</p> <p>23 MR. CARSON: She just said no.</p> <p>24 THE DEPONENT: My testimony is</p>	<p style="text-align: right;">Page 247</p> <p>1 Q. I have something to share here.</p> <p>2 Just a second. I want to go to another document.</p> <p>3 Give me one second here to pull up</p> <p>4 the document.</p> <p>5 A. I'm just curious. I have a</p> <p>6 question for you, sir.</p> <p>7 MR. CARSON: Do you want to go off</p> <p>8 the record?</p> <p>9 THE DEPONENT: Yeah, I mean, just</p> <p>10 real quick. I just have a question.</p> <p>11 My understanding is --</p> <p>12 THE VIDEOGRAPHER: Off the record</p> <p>13 3:08 p.m.</p> <p>14 The time is 3:09 p.m.</p> <p>15 We are back on the record.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. I want to wrap this up with you as</p> <p>18 well here, so I'm going to share this document.</p> <p>19 This is going to be marked as an</p> <p>20 exhibit. I guess it's Exhibit C, correct?</p> <p>21 (Deposition Exhibit C marked.)</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. I don't want to belabor this, so</p> <p>24 I'm going to ask you to read -- first of all, can</p>



<p>1 you identify this?</p> <p>2 A. It looks like the House Resume</p> <p>3 Bank.</p> <p>4 It looks like the House Resume</p> <p>5 Bank.</p> <p>6 Q. Would it help you if I scroll</p> <p>7 through it real briefly?</p> <p>8 A. It says what it is at the top.</p> <p>9 Resume Bank.</p> <p>10 Q. Okay. So I'm just going to slowly</p> <p>11 scroll this so you can get a sense of what the</p> <p>12 document is.</p> <p>13 If you want to read any of it,</p> <p>14 which you're probably gonna want to do after I</p> <p>15 ask the question, that's fine.</p> <p>16 But just for our sake here, this</p> <p>17 is -- this is, in fact, the resume that you</p> <p>18 submitted for your current position with the</p> <p>19 House of Representatives, correct?</p> <p>20 A. Incorrect.</p> <p>21 Q. Okay. Tell me why I'm incorrect.</p> <p>22 A. Okay. So there's what's known as</p> <p>23 a resume bank within the House of Representatives</p> <p>24 and members can go pull from there if they're</p>	<p>Page 248</p> <p>1 applied to Upton's office until after that. So</p> <p>2 there's likely that there were changes to it,</p> <p>3 because I got my job in less than a week with</p> <p>4 interviewing, so...</p> <p>5 Q. I don't follow you there.</p> <p>6 Why would getting your job in less</p> <p>7 than a week with interviewing lead you to believe</p> <p>8 that changes were made to your resume?</p> <p>9 A. Because I'm constantly updating my</p> <p>10 resume and asking people for input and revisions</p> <p>11 and things like that. I mean, I do that all the</p> <p>12 time.</p> <p>13 Q. So looking at this resume here in</p> <p>14 front of you, can you identify --</p> <p>15 A. If we can go side by side and line</p> <p>16 by line, but it's probably generally the same.</p> <p>17 But I'm not sure that it's completely exactly the</p> <p>18 same.</p> <p>19 Q. What was your hire date for your</p> <p>20 current job?</p> <p>21 A. August 19.</p> <p>22 Q. Okay. Does August 6, 2019, sound</p> <p>23 familiar?</p> <p>24 A. I did not get hired on that date.</p> <p>Page 250</p>
<p>1 having a hard time finding an employee.</p> <p>2 My resume was -- for my current</p> <p>3 position was never, like, obtained through this</p> <p>4 or anything like that.</p> <p>5 It was sent from Stephanie</p> <p>6 DeMarco, who works for Congressman Upton's</p> <p>7 office, directly to Erica Lafave, who then sent</p> <p>8 it on to my chief of staff.</p> <p>9 So my work doesn't -- my office</p> <p>10 doesn't participate in the resume bank for the</p> <p>11 U.S. House of Representatives and that is not</p> <p>12 where my resume or application came from my</p> <p>13 current job.</p> <p>14 Q. Okay. Fair enough.</p> <p>15 So your current job got your</p> <p>16 resume from a different source.</p> <p>17 Was it the same resume that you</p> <p>18 submitted to the resume bank?</p> <p>19 A. Probably not. I think that I</p> <p>20 submitted my resume to the resume bank earlier,</p> <p>21 but maybe, maybe not. But I think -- can you</p> <p>22 look at the date on that?</p> <p>23 Q. Sure.</p> <p>24 A. Yeah. I don't think that I even</p>	<p>Page 249</p> <p>1 I started my job on August 19th.</p> <p>2 Q. Okay. You started your job --</p> <p>3 wait. You're saying not August of '19, you're</p> <p>4 say August 19th?</p> <p>5 A. Yeah. That was the date of my</p> <p>6 hire. I started on August 19th.</p> <p>7 Q. I understand.</p> <p>8 Does it sound correct to you that</p> <p>9 then would you have gotten your offer to start</p> <p>10 that job on August 6th, 2019?</p> <p>11 A. I don't know about that. I don't</p> <p>12 know. I don't remember.</p> <p>13 Q. Okay. So nevertheless, regardless</p> <p>14 of whether you made changes to the resume that</p> <p>15 you submitted to your current position or not,</p> <p>16 you submitted this resume to the Resume Bank of</p> <p>17 the House, correct?</p> <p>18 A. Correct.</p> <p>19 Q. Was it true at the time you</p> <p>20 submitted it?</p> <p>21 A. Yeah, I guess.</p> <p>22 What do you mean was it true?</p> <p>23 Q. Was everything in it true?</p> <p>24 A. Yeah.</p> <p>Page 251</p>

<p style="text-align: right;">Page 252</p> <p>1 Q. Okay. And, in fact, you certified</p> <p>2 here that all of the information in your resume</p> <p>3 is correct and complete and then in capital</p> <p>4 letters it says here, I understand that any</p> <p>5 falsification or omission of any information</p> <p>6 constitutes grounds for any House of</p> <p>7 Representatives employer to not employ me or to</p> <p>8 dismiss me from employment, correct?</p> <p>9 A. Correct.</p> <p>10 Q. So you made an effort to make sure</p> <p>11 your resume was true and complete, correct?</p> <p>12 A. I also just clicked buttons and</p> <p>13 didn't read any of that. But sure.</p> <p>14 Q. You didn't read any of this?</p> <p>15 MR. CARSON: Objection.</p> <p>16 THE DEPONENT: No, I didn't. Who</p> <p>17 reads that? You just sign -- you just</p> <p>18 click the initials in the boxes and then</p> <p>19 you hit send.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Okay.</p> <p>22 A. Nobody does that.</p> <p>23 MR. CARSON: Can you guys hear me?</p> <p>24 MR. CAVALIER: Yes.</p>	<p style="text-align: right;">Page 254</p> <p>1 Q. It's all correct?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Okay. I want to show you one</p> <p>4 other part of it.</p> <p>5 You probably can't read that.</p> <p>6 It's probably too small.</p> <p>7 A. I got it. It's my cover letter.</p> <p>8 Q. Yes.</p> <p>9 A. Uh-huh.</p> <p>10 Q. Can you take a look at that and</p> <p>11 tell me anything that you note that is incorrect?</p> <p>12 A. None of it.</p> <p>13 Q. Well, I'd like you to read it for</p> <p>14 the record to make sure that --</p> <p>15 MR. CARSON: She wrote it, didn't</p> <p>16 she?</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Take a minute and read it and let</p> <p>19 me know if anything in there is incorrect.</p> <p>20 A. Nothing's incorrect.</p> <p>21 Q. I'm gonna ask you about this Wall</p> <p>22 Street Journal reference here.</p> <p>23 Do you remember what that's in</p> <p>24 reference to?</p>
<p style="text-align: right;">Page 253</p> <p>1 THE DEPONENT: Yes.</p> <p>2 MR. CARSON: Please listen for my</p> <p>3 objections.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Okay. So we now have your resume</p> <p>6 up that you submitted to the House bank.</p> <p>7 I'm going to ask you to take a</p> <p>8 second to read the summary and experience</p> <p>9 sections here.</p> <p>10 A. Uh-huh.</p> <p>11 Q. And I want you to tell me anything</p> <p>12 in there that is not correct.</p> <p>13 MR. CARSON: We can't see it.</p> <p>14 Can we make it bigger?</p> <p>15 THE DEPONENT: I'm gonna have to</p> <p>16 hold my thing up.</p> <p>17 MR. CAVALIER: How's that? Do you</p> <p>18 need it bigger?</p> <p>19 MR. CARSON: A little better.</p> <p>20 THE DEPONENT: You can scroll</p> <p>21 down, please.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. Sure.</p> <p>24 A. Correct. It's all right.</p>	<p style="text-align: right;">Page 255</p> <p>1 A. No. But here's how this works.</p> <p>2 So we have a --</p> <p>3 MR. CARSON: He didn't ask how it</p> <p>4 works. He just said, do you remember</p> <p>5 what it's about.</p> <p>6 Yes or no, do you remember?</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. So how do you know it's correct?</p> <p>9 A. I know it's correct, because I</p> <p>10 don't remember the exact article that we got</p> <p>11 placed in the Wall Street Journal. However, when</p> <p>12 I -- even when I was not a communications</p> <p>13 director in name only, when I was Greg's</p> <p>14 assistant, we would have requests come in all the</p> <p>15 time. And what we do is, we'd have requests come</p> <p>16 in all the time but we also have a running</p> <p>17 spreadsheet in Monday.com that could be filtered</p> <p>18 through by type and organization.</p> <p>19 And from when I started helping</p> <p>20 Delaney with that, back in June of 2019, you can</p> <p>21 sort it and it will tell you -- it will sort it</p> <p>22 and tell you every outlet. You can sort it by</p> <p>23 outlet. You can sort it by author. You can sort</p> <p>24 it by whatever.</p>

<p>Page 256</p> <p>1 And so I went in and from the</p> <p>2 dates I started helping with that I calculated</p> <p>3 them all up.</p> <p>4 Q. So that's how you got to 1128</p> <p>5 articles --</p> <p>6 A. Yes.</p> <p>7 MR. CARSON: That's a pretty</p> <p>8 accurate way of doing that.</p> <p>9 THE DEPONENT: That was actually</p> <p>10 from our report that Mark Fink asked me</p> <p>11 to write. And those are the numbers that</p> <p>12 I also submitted to Mark Fink for our</p> <p>13 general operating support.</p> <p>14 That is correct.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. Okay. So that's where you got the</p> <p>17 number.</p> <p>18 A. Uh-huh.</p> <p>19 Q. How did you then get the piece you</p> <p>20 wrote here, where it says from D.C.'s Influential</p> <p>21 Hill to the Wall Street Journal from the</p> <p>22 Washington Times to Foreign Policy?</p> <p>23 A. Because they were all on the list.</p> <p>24 Q. Okay. So you went through the</p>	<p>Page 258</p> <p>1 still Greg's assistant. Quote, unquote,</p> <p>2 assistant, yes.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Okay. But my point is, to the</p> <p>5 extent that Delaney is doing work placing</p> <p>6 articles that you're referencing here, to the</p> <p>7 extent she was working under you, it's fair for</p> <p>8 you to state on your resume that you helped place</p> <p>9 those articles?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. Do you have any specific</p> <p>12 recollection sitting here today what the two</p> <p>13 articles were that were placed with the Wall</p> <p>14 Street Journal during your time with the forum?</p> <p>15 MR. CARSON: Objection. Asked and</p> <p>16 answered. You can answer.</p> <p>17 THE DEPONENT: Clearly do not.</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. How about same answer for the</p> <p>20 Hill?</p> <p>21 A. Yeah, I clearly don't.</p> <p>22 This was from what we wrote from</p> <p>23 the GOS report that I submitted to Mark Fink and</p> <p>24 I believe was used, so -- in our general</p>
<p>Page 257</p> <p>1 list and you saw that those names were on it?</p> <p>2 A. Yes. And because, like, I was</p> <p>3 overseeing Delaney as she would ask me how to</p> <p>4 write things, and so whatever was on the list was</p> <p>5 going through me or Delaney.</p> <p>6 Q. Okay. So whether it went through</p> <p>7 you and Delaney, that, for you, was enough for</p> <p>8 you to list that as part of this 1128 articles?</p> <p>9 A. Absolutely. Because not only</p> <p>10 that, she would ask me how to pitch things, how</p> <p>11 to write things. And I would correct all her</p> <p>12 e-mails.</p> <p>13 I was an integral part in helping</p> <p>14 me and helping Delaney and Middle East Forum get</p> <p>15 those things done.</p> <p>16 Q. And because she was your</p> <p>17 subordinate, right? I mean, she was doing that</p> <p>18 work underneath you, correct?</p> <p>19 MR. CARSON: Objection. That</p> <p>20 question has been asked nine times today.</p> <p>21 You can answer the question again.</p> <p>22 THE DEPONENT: It was more</p> <p>23 collaborative at that point, because I</p> <p>24 had started that before -- when I was</p>	<p>Page 259</p> <p>1 operating support thing.</p> <p>2 So, you know, it wasn't questioned</p> <p>3 at the time and it certainly wasn't questioned</p> <p>4 now. It was, like, our standard language.</p> <p>5 Q. Okay. But sitting here today, I</p> <p>6 mean, I want to ask a very specific, very narrow</p> <p>7 question.</p> <p>8 Sitting here today, do you -- can</p> <p>9 you state with any certainty that you, in fact,</p> <p>10 placed or helped to place an article in the Wall</p> <p>11 Street Journal?</p> <p>12 A. Very likely. But I don't remember</p> <p>13 off the top of my head. What is the point of</p> <p>14 this? I'm confused.</p> <p>15 Q. The point is to find out --</p> <p>16 MR. CARSON: He's trying to call</p> <p>17 you a liar is the point. And the fact is</p> <p>18 you used a computerized system that seems</p> <p>19 to be infallible to come up with the</p> <p>20 numbers and so now he is looking for a</p> <p>21 way to continue calling you a liar.</p> <p>22 I guess to the extent you</p> <p>23 understand what he is saying, you can</p> <p>24 answer.</p>

<p>Page 260</p> <p>1 MR. CAVALIER: Well, with that</p> <p>2 improper, inappropriate and ridiculous --</p> <p>3 MR. CARSON: The questions are</p> <p>4 what's inappropriate. But we can</p> <p>5 continue.</p> <p>6 BY MR. CAVALIER:</p> <p>7 Q. Do you need me to restate the</p> <p>8 question?</p> <p>9 A. No. Like I said, it was likely,</p> <p>10 like I said, how I got the number and the outlets</p> <p>11 were sorting it by date in our Monday.com source</p> <p>12 thing.</p> <p>13 So those were from Monday.com in</p> <p>14 between those date ranges.</p> <p>15 Q. Do you remember ever talking to</p> <p>16 Daniel Pipes about any work with the Wall Street</p> <p>17 Journal?</p> <p>18 A. I don't.</p> <p>19 Q. Do you remember ever talking to</p> <p>20 anybody at the Wall Street Journal about an</p> <p>21 article for the Middle East Forum?</p> <p>22 A. I remember reaching out to their</p> <p>23 staff to set up meetings and things like that,</p> <p>24 but other than that, I don't recall specifics.</p>	<p>Page 262</p> <p>1 A. I do not remember. That is my</p> <p>2 answer for the tenth time.</p> <p>3 MR. CARSON: It doesn't say -- the</p> <p>4 thing doesn't say she talked to people at</p> <p>5 Fox News. It says she helped with</p> <p>6 those --</p> <p>7 MR. CAVALIER: I never said that</p> <p>8 it said that. It's just a question.</p> <p>9 THE DEPONENT: Like I said, I</p> <p>10 don't remember.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Aside from your counsel's</p> <p>13 long-winded speaking objections, is there some</p> <p>14 reason, sitting here today, that you're finding</p> <p>15 these questions to be offensive?</p> <p>16 A. No, I'm just tired, Buddy. I</p> <p>17 worked a 10-hour day yesterday and we're here</p> <p>18 talking about if I remember something from</p> <p>19 before, like, and I don't even remember the</p> <p>20 two -- the two people I talked to yesterday.</p> <p>21 There's a guy that was just in my</p> <p>22 e-mail just now, Mario Diaz, that was asking for</p> <p>23 an interview with the Congressman. I can't even</p> <p>24 tell you what outlet he's from.</p>
<p>Page 261</p> <p>1 We did this all the time, so I</p> <p>2 don't recall every specific time.</p> <p>3 Like you said, there's 1100 there.</p> <p>4 Q. Well, I'm only talking about the</p> <p>5 Wall Street Journal.</p> <p>6 A. I don't remember.</p> <p>7 Q. Do you ever remember reaching out</p> <p>8 to them at all?</p> <p>9 A. I believe I did reach out to them</p> <p>10 but I don't remember when.</p> <p>11 Q. Do you remember who you would</p> <p>12 reach out to?</p> <p>13 A. No.</p> <p>14 Q. Do you remember speaking with</p> <p>15 anybody from the Wall Street Journal during your</p> <p>16 time at Middle East Forum?</p> <p>17 A. Likely. I mean, like, I -- I</p> <p>18 speak with people -- like right now, Fox News,</p> <p>19 the lady just asked me for an interview on Fox</p> <p>20 News. I have no idea what her name was. I mean,</p> <p>21 I respond to interview requests all the time.</p> <p>22 Q. I understand that you're saying</p> <p>23 that it's likely that you did so, but what I'm</p> <p>24 asking you --</p>	<p>Page 263</p> <p>1 There's so many of them. So it's</p> <p>2 exhausting for you to keep asking me the same</p> <p>3 questions over and over again when I tell you I</p> <p>4 don't remember.</p> <p>5 MR. CARSON: It's even more</p> <p>6 exhausting when it has zero, literally</p> <p>7 zero, connection why we're here today.</p> <p>8 You're looking at the resume that</p> <p>9 was posted in a resume bank at the job</p> <p>10 she has now.</p> <p>11 There's no connection with the</p> <p>12 instant matter. There's no connection</p> <p>13 with the counterclaims.</p> <p>14 MR. CAVALIER: Fortunately I get</p> <p>15 to determine what I want to ask her.</p> <p>16 MR. CARSON: Go ahead.</p> <p>17 THE DEPONENT: I don't know.</p> <p>18 MR. CARSON: Waste the whole day</p> <p>19 talking about something -- you know, it's</p> <p>20 just --</p> <p>21 THE DEPONENT: Keep going.</p> <p>22 MR. CARSON: It's really</p> <p>23 offensive, because everyone here is busy</p> <p>24 and we're wasting the entire day on</p>



<p>1 questions that have nothing to do with 2 the reason why we're actually here. 3 So I guess we'll continue doing 4 it. 5 THE DEPONENT: There is a sexual 6 harassment case and now you're asking me 7 about the Wall Street Journal. 8 BY MR. CAVALIER: 9 Q. Ms. Barbounis, you understand, do 10 you not, that it's relevant to your credibility 11 when on the one hand you play up your 12 experience -- 13 A. So you are trying to call me a 14 liar. 15 MR. CARSON: Yeah. Exactly. Here 16 we go. 17 THE DEPONENT: I'm ready. 18 BY MR. CAVALIER: 19 Q. You understand it's relevant to 20 your credibility, if you are, in fact, playing up 21 your responsibilities to a future employer while 22 playing them down to benefit your lawsuit, 23 correct? 24 You understand how that is</p>	<p>Page 264</p>	<p>1 the basis for including this information 2 was a computer program. 3 That's where you go, all right, 4 next topic. 5 But instead we're here for another 6 20 minutes talking about her resume for 7 her current job and whether or not she 8 ever spoke with someone at the Wall 9 Street Journal. 10 MR. CAVALIER: Seth, we're here 11 for 20 minutes, because you keep 12 launching these soliloquies and 13 objections. 14 MR. CARSON: That's absolutely not 15 why we're here. But go ahead. 16 MR. CAVALIER: Not to mention when 17 I ask a very simple, straight forward 18 question, like who did you talk to there 19 and I get a speech in response -- 20 THE DEPONENT: Not an I don't 21 remember. You kept asking me over and 22 over again. 23 MR. CARSON: How much more do we 24 have on the resume?</p>	<p>Page 266</p>
<p>1 relevant advance? 2 MR. CARSON: Objection. 3 Argumentive. 4 THE DEPONENT: You do 5 understand -- 6 MR. CARSON: Lisa, wait. Don't 7 talk over me. 8 THE DEPONENT: Sorry. I didn't 9 know you weren't done. 10 MR. CARSON: No. You don't have 11 to answer that question. It's 12 argumentive. It has nothing to do with 13 this case. It's just designed to harass 14 you and you don't have to answer it. 15 MR. CAVALIER: It's designed to 16 respond to your counsel's improper 17 speaking objection. 18 BY MR. CAVALIER: 19 Q. But you do understand that, do you 20 not? 21 MR. CARSON: You're not raising 22 credibility issues. You're showing her a 23 resume where she said she helped on an 24 article. She told you the exact way --</p>	<p>Page 265</p>	<p>1 MR. CAVALIER: However much I want 2 to get into. 3 THE DEPONENT: That's really 4 professional, too. 5 BY MR. CAVALIER: 6 Q. Where you say additionally I 7 arranged for 27 of our experts to be interviewed 8 92 times by A-1 media outlets on both radio and 9 television, are any of those 27 experts Middle 10 East Forum fellows? 11 A. Yes. 12 Q. And where you say the connections 13 that you have made and maintained with members of 14 the press over the years may be one of my biggest 15 contributions to effectively assist in forwarding 16 the members' objectives? 17 A. Correct. 18 Q. Those connections to the press 19 that you're referencing are connections that you 20 made during your work at the Forum, correct? 21 A. Guys, you don't live in a bubble. 22 I mean, I made connections with press. And I'm 23 friendly with them. 24 Like, for example, I made a</p>	<p>Page 267</p>

<p style="text-align: right;">Page 268</p> <p>1 connection with the press in England and I still  2 maintain friendships with those people and I was  3 there on my own time. It had nothing to do with  4 MEF. And so that I have maintained over the  5 years.  6 When I worked in Congressman  7 Costello's office, I made relationships with the  8 press.  9 MR. CARSON: Lisa, it was a yes or  10 no question. He said the connections  11 made with the press were things that you  12 did when you were at the Forum. The  13 answer is yes.  14 THE DEPONENT: My point is -- my  15 point is --  16 MR. CARSON: He didn't ask you for  17 an explanation though. Just say yes or  18 no.  19 THE DEPONENT: I want to get out  20 of here, too. I'm sorry. Go ahead, go.  21 MR. CARSON: I guess MEF is  22 insinuating that they own the press now,  23 too.  24</p>	<p style="text-align: right;">Page 270</p> <p>1 MR. CARSON: John, one of the  2 Middle East Forum's claims in the trade  3 secrets case is that Lisa Barbounis isn't  4 allowed to share information about press  5 contacts with other people.  6 THE DEPONENT: Correct.  7 MR. CARSON: They're literally  8 claiming that somebody's e-mail address  9 is a member of the press is a trade  10 secret. It's ludicrous. It's absurd.  11 That's the basis for being objectionable.  12 MR. CAVALIER: Regardless of  13 what's going on in the trade secrets  14 case, this question has nothing to do  15 with that. It's a simple,  16 straightforward question.  17 MR. CARSON: Let's just get  18 through this. Yes or no.  19 BY MR. CAVALIER:  20 Q. Whether you made connections to  21 the present during your time with the Middle East  22 Forum?  23 A. Some of my connections were made  24 during my time at Middle East Forum.</p>
<p style="text-align: right;">Page 269</p> <p>1 BY MR. CAVALIER:  2 Q. I'm not insinuating anything. I'm  3 asking you whether you made connections with the  4 press at the Middle East Forum.  5 A. Some of them, yes. Some.  6 Q. Is there something about that  7 question that you find objectionable?  8 A. Yes.  9 MR. CARSON: I do.  10 THE DEPONENT: I do, yes.  11 MR. CAVALIER: Why?  12 MR. CARSON: Because the question  13 insinuates that the Middle East Forum has  14 some sort of claim to the connections  15 with the press.  16 THE DEPONENT: I agree.  17 MR. CARSON: What is the point of  18 the question?  19 MR. CAVALIER: I would love to  20 understand how the question, did you make  21 connections with the press, has any kind  22 of a connotation --  23 THE DEPONENT: Well, then what was  24 your purpose for asking?</p>	<p style="text-align: right;">Page 271</p> <p>1 Q. Okay.  2 MR. CAVALIER: I think this is  3 Exhibit D.  4 THE DEPONENT: Okay.  5 (Deposition Exhibit Number D  6 marked.)  7 BY MR. CAVALIER:  8 Q. This is a text message chain. We  9 can identify it. But I'll represent to you that  10 it's a text message chain between you and Tricia  11 McNulty.  12 Does that look correct to you?  13 And you can read through some of  14 it, all of it, if you want to. I don't think you  15 want to read all 77 pages.  16 But does that seem to be correct  17 to you?  18 A. Sure. I mean, I don't see where  19 it says Tricia's name anywhere. Anywhere at all  20 actually.  21 Q. Well, do you have any reason to  22 doubt my representation to you this is a document  23 that we got in the production of this case?  24 A. Yes. You've done nothing but</p>

<p style="text-align: right;">Page 272</p> <p>1 disparage me intentionally over and over again.</p> <p>2 Q. All right. So let's identify the</p> <p>3 document.</p> <p>4 Let me know -- well, I'll tell you</p> <p>5 what.</p> <p>6 You can read it and you can let me</p> <p>7 know you feel comfortable identifying it as your</p> <p>8 text message change with Tricia McNulty.</p> <p>9 A. Okay. Slow down.</p> <p>10 Q. I'll note that this was produced</p> <p>11 by your counsel.</p> <p>12 A. Now it says McNulty. I said I</p> <p>13 didn't see her name. Now I see her name. Now I</p> <p>14 know who it's with.</p> <p>15 Okay. Keep going.</p> <p>16 Q. Can we now agree that this is a</p> <p>17 chain of documents --</p> <p>18 MR. CARSON: I can represent, too,</p> <p>19 that McNulty 207 is a Bates stamp that I</p> <p>20 put on the document and produced in the</p> <p>21 Patricia McNulty versus MEF case. And</p> <p>22 this does look like a thread that I</p> <p>23 produced.</p> <p>24 THE DEPONENT: Okay. Then, yes, I</p>	<p style="text-align: right;">Page 274</p> <p>1 reference to?</p> <p>2 A. Absolutely no idea.</p> <p>3 MR. CARSON: Look at the date.</p> <p>4 THE DEPONENT: Oh, the date.</p> <p>5 I would guess that would be our --</p> <p>6 that meeting that we had -- I'm guessing,</p> <p>7 though, still that that would be a</p> <p>8 meeting that we had about Greg Roman and</p> <p>9 all.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. Okay. So as you best you know,</p> <p>12 this was in reference to the November of 2018</p> <p>13 meeting, the all-hands meeting that's been</p> <p>14 referred to in this case, correct?</p> <p>15 A. Okay.</p> <p>16 Q. Okay. Same day, you ask her --</p> <p>17 you send her a link to a D.C. Young Republicans</p> <p>18 event?</p> <p>19 A. Uh-huh.</p> <p>20 Q. 2018 Holiday Gala?</p> <p>21 A. Uh-huh.</p> <p>22 Q. And you ask, want to go if we</p> <p>23 still have jobs?</p> <p>24 A. Right.</p>
<p style="text-align: right;">Page 273</p> <p>1 agree that that's what this is.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Okay. So you see here it's</p> <p>4 dated -- I'm gonna ask you about specific</p> <p>5 segments of this text chain.</p> <p>6 Okay?</p> <p>7 A. Yeah.</p> <p>8 Q. This first one is dated</p> <p>9 November 3rd. I'll make it a little bigger for</p> <p>10 you, so you can see it easier.</p> <p>11 And just so we're clear, on this</p> <p>12 text thread, Patricia is in blue and you're in</p> <p>13 gray, correct?</p> <p>14 A. Okay.</p> <p>15 Q. Do you agree with that?</p> <p>16 A. Sure.</p> <p>17 Q. Okay. On 11/3/18 at 10:47 a.m.,</p> <p>18 Tricia says to you, did you see that e-mail about</p> <p>19 Monday morning. You say, yes, there's a couple</p> <p>20 emogis.</p> <p>21 She says, oh, God, I hate it.</p> <p>22 You say, I know. I don't know</p> <p>23 what is happening.</p> <p>24 Do you know what that is in</p>	<p style="text-align: right;">Page 275</p> <p>1 Q. What did you mean by that?</p> <p>2 A. Exactly what it said. Like, if we</p> <p>3 all don't get fired for, you know, ratting on</p> <p>4 Greg Roman.</p> <p>5 Q. Did you think you were gonna get</p> <p>6 fired for ratting on Greg Roman?</p> <p>7 A. Absolutely.</p> <p>8 Q. Why did you think that?</p> <p>9 A. Because Daniel Pipes was so</p> <p>10 entrenched with Greg Roman, like, you know,</p> <p>11 nothing -- like anything Greg Roman could do was,</p> <p>12 like, gold. And so they would, you know, -- he</p> <p>13 would always want to keep Greg over us.</p> <p>14 Q. Okay. But just for the record,</p> <p>15 this November of 2018 meeting was the first time</p> <p>16 you ever voiced those complaints to Daniel Pipes,</p> <p>17 correct?</p> <p>18 A. Listen, you live in that</p> <p>19 atmosphere, you know what it's like. That's all</p> <p>20 I'm going to say.</p> <p>21 Q. Well, I appreciate that. But</p> <p>22 that's actually not an answer to the question.</p> <p>23 A. It isn't? What was the question</p> <p>24 then?</p>

<p>Page 276</p> <p>1 Q. The question is, did you ever</p> <p>2 complain to Daniel Pipes about Greg Roman before</p> <p>3 the November of 2018 meeting?</p> <p>4 A. No.</p> <p>5 Q. So it's fair to say then that you</p> <p>6 didn't know how he would react to a complaint</p> <p>7 about Greg Roman prior to that pointed in time?</p> <p>8 A. Well, my suspicions were confirmed</p> <p>9 when I did complain.</p> <p>10 Q. I thought you told us that you</p> <p>11 were not fired as a result of your complaint?</p> <p>12 A. I wasn't fired. I sat there and</p> <p>13 sobbed after he came in my office and said,</p> <p>14 priests have been accused of more and get to keep</p> <p>15 their jobs.</p> <p>16 So Greg will be staying. And then</p> <p>17 I -- he left and I walked into the middle room</p> <p>18 and I sobbed like a child uncontrollably where it</p> <p>19 was, like, the -- because I knew that it was only</p> <p>20 going to get worse from there.</p> <p>21 And that nothing that we said made</p> <p>22 a difference with Daniel Pipes, because Greg was</p> <p>23 his whatever. Meal ticket. Equal. Whatever he</p> <p>24 was. His chosen child. I don't know.</p>	<p>Page 278</p> <p>1 of the way.</p> <p>2 November 3rd, 2018, you get a</p> <p>3 message from Tricia that says, Neil just sent me</p> <p>4 a text that says, hey, T-bone, how's it going.</p> <p>5 Do you have any idea what that</p> <p>6 means?</p> <p>7 A. She was probably talking about --</p> <p>8 like her current fiancée, they were -- they were</p> <p>9 in the beginning stages of dating around this</p> <p>10 time.</p> <p>11 So I'm sure she was unhappy that</p> <p>12 he sent her a text message saying, hey, T-bone.</p> <p>13 Q. Okay. You said, I hope you didn't</p> <p>14 answer. And then you say, I'm not signing this</p> <p>15 NDA. I haven't sent it yet, but --</p> <p>16 A. And then I sent my response.</p> <p>17 Q. You sent your response to Tricia?</p> <p>18 A. Correct.</p> <p>19 Q. Okay.</p> <p>20 A. About what I was gonna write to</p> <p>21 Daniel.</p> <p>22 Q. Did you ever end up writing that</p> <p>23 to Daniel?</p> <p>24 A. I did.</p>
<p>Page 277</p> <p>1 Q. Did you tell Daniel Pipes that you</p> <p>2 wanted Greg Roman fired?</p> <p>3 A. Yes, in the office. In my office.</p> <p>4 Q. Then come May you wanted him back?</p> <p>5 MR. CARSON: Objection.</p> <p>6 THE DEPONENT: We've already been</p> <p>7 over this.</p> <p>8 I didn't want him back. And it</p> <p>9 was supposed to be a probationary period</p> <p>10 anyway. And then when people complained</p> <p>11 to Daniel, he again said it was us</p> <p>12 mooning.</p> <p>13 Now, come on. Sorry. I didn't</p> <p>14 mean to be adversarial. This is the same</p> <p>15 stuff over and over again.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Did you still have your job at the</p> <p>18 time that the D.C. Young Republican's Gala came</p> <p>19 around?</p> <p>20 A. We ended up not going. It was</p> <p>21 sold out. But probably. Probably in December.</p> <p>22 Q. All right. Moving to 11/4.</p> <p>23 A. Uh-huh.</p> <p>24 Q. Well, first, let me get this out</p>	<p>Page 279</p> <p>1 Q. Okay. Can you describe for me</p> <p>2 what concern you had with the NDA that he was</p> <p>3 putting in front of you?</p> <p>4 I know it's here on the</p> <p>5 screenshot, but I need you to describe it.</p> <p>6 A. There was a new clause in there</p> <p>7 that would prohibit us from seeking an attorney</p> <p>8 in general.</p> <p>9 And I didn't -- like and at that</p> <p>10 point we didn't even -- I certainly didn't want</p> <p>11 to engage in a lawsuit for a various amount of</p> <p>12 reasons.</p> <p>13 And -- but I didn't like that he</p> <p>14 was taking the option completely away from us to</p> <p>15 have no recourse. Should I need to have</p> <p>16 recourse, I didn't have to.</p> <p>17 Q. Okay. So you read the NDA at this</p> <p>18 point in time?</p> <p>19 A. The new one, correct.</p> <p>20 Q. Right.</p> <p>21 You had a problem with it,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. And you voiced that problem to</p>



<p>Page 280</p> <p>1 Daniel Pipes, correct?</p> <p>2 A. Correct.</p> <p>3 Q. And he then revised the NDA to</p> <p>4 account for your issue, correct?</p> <p>5 A. Incorrect.</p> <p>6 Q. How is that incorrect?</p> <p>7 A. He said he agreed and I didn't</p> <p>8 have to sign it.</p> <p>9 Q. So here a little further down, you</p> <p>10 say, Matt said just sign it, don't be stupid.</p> <p>11 They are doing this for Greg, not for us. But do</p> <p>12 we trust them? I just talked to Marnie. She</p> <p>13 isn't signing it either.</p> <p>14 You're referring to Marnie Meyer</p> <p>15 there?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. So you guys are all talking</p> <p>18 about this NDA at this point in time, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And here you say Delaney doesn't</p> <p>21 want to sign it either. Obviously messages from</p> <p>22 them.</p> <p>23 A. That's messages from Ovi. It's</p> <p>24 something to make her feel better. It's a joke</p>	<p>Page 282</p> <p>1 A. No.</p> <p>2 Q. Okay. So after some discussion</p> <p>3 about Ovi, and then I just asked you about this</p> <p>4 earlier, but at 11:06 same day, 11/4/18, you say,</p> <p>5 all good, DP, I'm assuming that means Daniel</p> <p>6 Pipes, amended the NDA. I'm signing.</p> <p>7 A. So -- correct. So apparently he</p> <p>8 said he took out that clause or whatever.</p> <p>9 But then he also told me in an</p> <p>10 e-mail that I didn't have to sign it and I did</p> <p>11 not sign a new NDA that day.</p> <p>12 Q. That day?</p> <p>13 A. Or at all.</p> <p>14 I've never signed a new NDA from</p> <p>15 the time I got hired. I didn't sign the amended</p> <p>16 one. I didn't sign anything after my original</p> <p>17 NDA.</p> <p>18 Q. Okay. Do you know if Patricia</p> <p>19 signed one?</p> <p>20 A. I don't think so.</p> <p>21 Q. Do you know if Delaney signed one?</p> <p>22 A. I don't think she did.</p> <p>23 Q. Do you know if Katrina Brady</p> <p>24 signed one?</p>
<p>Page 281</p> <p>1 of some sort.</p> <p>2 Q. Right. Who is Ovi?</p> <p>3 A. A friend of mine from Australia.</p> <p>4 Q. It says here, tell Tricia to</p> <p>5 message me.</p> <p>6 Does Tricia know Ovi?</p> <p>7 A. Yeah, so Tricia and Ovi, like, had</p> <p>8 talked on the phone a couple of times before,</p> <p>9 like -- like I had said, she had just started</p> <p>10 dating Neil at this point.</p> <p>11 And before that, she was talking</p> <p>12 to Ovi to date him. And so he said, tell Tricia</p> <p>13 to call me again. Because they had, I think,</p> <p>14 stopped talking for a little bit.</p> <p>15 Q. Okay. And he says here that he's</p> <p>16 interested, right? She's hot, blonde, eyes,</p> <p>17 smart. That's from Ovi?</p> <p>18 A. Yeah.</p> <p>19 Q. And you said you sent this to sort</p> <p>20 of make her feel better, correct?</p> <p>21 A. She thought Ovi was attractive and</p> <p>22 clearly he thought she was attractive.</p> <p>23 Q. Okay. Is he banned from entering</p> <p>24 the U.S.?</p>	<p>Page 283</p> <p>1 A. I don't think any of us did.</p> <p>2 Q. Okay. And as you said, here he</p> <p>3 says later, we can't really tell, there's no</p> <p>4 header, but at the bottom, given it says Daniel,</p> <p>5 looks like you're sending Patricia a copy of an</p> <p>6 e-mail that Daniel Pipes sent to you about the</p> <p>7 NDA, correct?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Okay. And is this e-mail</p> <p>10 capturing what you just described to me about the</p> <p>11 fact that you had a prior NDA, making the second</p> <p>12 NDA unnecessary, according to Daniel Pipes?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Same exhibit, a little further</p> <p>15 down.</p> <p>16 The next day, 11/5, out of the</p> <p>17 blue you say, I'm so ducking sad.</p> <p>18 She says, why.</p> <p>19 You say, I'm just so sad, I don't</p> <p>20 know.</p> <p>21 And then she -- she sends you a</p> <p>22 long text about what you're gonna do in the</p> <p>23 future in working with Daniel Pipes in a</p> <p>24 different light, where he can see that you do</p>

<p style="text-align: right;">Page 284</p> <p>1 good work and solidify your importance to him.</p> <p>2 What are you guys talking about</p> <p>3 there?</p> <p>4 A. Exactly what it says. I was sad,</p> <p>5 having a bad day. She was, like, I think all</p> <p>6 this is draining.</p> <p>7 She said, that's what you're left</p> <p>8 with. But I think it's going to only be up from</p> <p>9 here.</p> <p>10 You're gonna get a fancy title</p> <p>11 you're proud of. You'll be immersed in content.</p> <p>12 Sure, not in the way you want. But this is a</p> <p>13 good stepping stone to that.</p> <p>14 Oh, we were talking about my --</p> <p>15 she was talking about me doing the web editing.</p> <p>16 And apparently at this time, this is before we</p> <p>17 discussed my title, they were talking about</p> <p>18 calling me the online editor.</p> <p>19 Q. Is that a title that you wanted?</p> <p>20 A. No.</p> <p>21 Q. Why not?</p> <p>22 A. Because I don't do online editing.</p> <p>23 I don't edit websites. And I didn't even know</p> <p>24 how to at that point.</p>	<p style="text-align: right;">Page 286</p> <p>1 probably Daniel Thomas.</p> <p>2 Q. Just for the record, that's</p> <p>3 McNulty 225, that page of Exhibit D.</p> <p>4 Same exhibit on McNulty 241.</p> <p>5 On 11/20/18. Can you take a</p> <p>6 second and read that text from you to Patricia</p> <p>7 McNulty?</p> <p>8 A. I don't know</p> <p>9 Q. I'm sorry?</p> <p>10 A. Yeah, I don't even remember what</p> <p>11 that's about.</p> <p>12 Q. Do you know what she was referring</p> <p>13 to when she said you saw her rolling her eyes at</p> <p>14 you while you were talking that day?</p> <p>15 A. I have no idea. I don't even</p> <p>16 remember this. Because I, like, never get in an</p> <p>17 argument with Tricia. Rare. I don't know what</p> <p>18 this is about.</p> <p>19 Q. You say here that you know that</p> <p>20 she's not happy with your behavior and the Danny</p> <p>21 thing.</p> <p>22 A. I have no idea what that means. I</p> <p>23 swear to God I have no idea.</p> <p>24 Q. Is the Danny thing the thing you</p>
<p style="text-align: right;">Page 285</p> <p>1 Q. All right.</p> <p>2 A. And it was sad.</p> <p>3 Q. Why was it sad?</p> <p>4 A. Because, you know, I worked my</p> <p>5 whole life to write legislation. I went to</p> <p>6 school and worked previously to write legislation</p> <p>7 and do policy.</p> <p>8 It wasn't to edit articles and</p> <p>9 take the HDML code and put it up on a website.</p> <p>10 I mean, I went to a Ivy league</p> <p>11 school to do policy.</p> <p>12 Q. Were you doing policy in your job</p> <p>13 at the Middle East Forum?</p> <p>14 A. Absolutely was, yeah.</p> <p>15 Q. So the policy part of it was what</p> <p>16 you were more interested in?</p> <p>17 A. Uh-huh. Still am.</p> <p>18 Q. Same exhibit, November 10th.</p> <p>19 I'll give you a second to read</p> <p>20 those two texts.</p> <p>21 A. Looks like me being upset over a</p> <p>22 boy.</p> <p>23 Q. Do you remember what boy?</p> <p>24 A. Given the time period here, it's</p>	<p style="text-align: right;">Page 287</p> <p>1 just mentioned about Danny Thomas?</p> <p>2 A. She just didn't like Danny Thomas</p> <p>3 anyway. She just always thought he wasn't good</p> <p>4 enough for me.</p> <p>5 Q. Okay. Do you know what she talks</p> <p>6 about when she references -- strike that.</p> <p>7 Do you know what you're talking</p> <p>8 about when you say you know she's not happy with</p> <p>9 your behavior?</p> <p>10 A. No. I'm actually curious. I'm</p> <p>11 sitting here wondering what that would be about.</p> <p>12 Q. Okay. And she says here that</p> <p>13 she's hurting your feelings and you don't like</p> <p>14 it, correct?</p> <p>15 A. That's what it says, yeah.</p> <p>16 Q. All right.</p> <p>17 A. I have no idea what this is about,</p> <p>18 so I'm gonna read what she says.</p> <p>19 Q. Yeah, let's read what she says.</p> <p>20 A. This is a very strange</p> <p>21 conversation. It's not ringing -- it's honestly</p> <p>22 not ringing a bell.</p> <p>23 It looks like I was talking a lot</p> <p>24 about, like, -- like there was some time where</p>

<p>Page 288</p> <p>1 Daniel liked my writing and he would, like, send 2 it back with no, like, red edits. 3 He's a sharp -- like, he's a 4 editor and when he writes, it's like -- you know, 5 you get nervous. 6 And I was probably excited that I 7 wrote something that he didn't correct. And 8 maybe being braggy and she didn't like that 9 behavior. That's what it looks like. 10 Q. Okay. And it also looks like 11 she's mentioning that you only are ever talking 12 about Tommy and Danny and Ovi and Cassandra and 13 all these shiny people, she says. 14 A. That are so much more interesting. 15 Yeah, I think for, like, a time, 16 you know, like, with anything else in your life, 17 you talk about the new things that are going on. 18 So, I guess, that she was upset 19 that I was talking about that and not whatever 20 else. But like I said, when you have new things 21 going on, that's what you talk about. 22 Q. And she says here to you, London 23 is better, I get it. They are better, I get it. 24 A. I never thought they were better,</p>	<p>Page 290</p> <p>1 remember. 2 11/20, yeah, about that. It was 3 like -- it was before I actually, like, started 4 having a real relationship with Danny. Yeah. 5 Q. Okay. 6 A. Not a real relationship. Like an 7 active relationship. 8 Q. Okay. 9 MR. CARSON: I object to that 10 question. 11 BY MR. CAVALIER: 12 Q. And just because I want to give 13 you a chance to fully explain, do you think you 14 were only talking about being excited about the 15 relationship with Danny? 16 Or were you also talking about the 17 work that you were doing in London for Tommy? 18 A. Probably -- I mean, like -- I 19 liked that work. 20 Q. And you were excited about it? 21 A. Yeah, I was good at it. 22 Q. Same exhibit. And for the record 23 this is McNulty 276. 24 A. That was funny.</p>
<p>Page 289</p> <p>1 by the way. 2 Tricia is like my angel. And, 3 like, I think she's an admirable person that I 4 look up to. So for her to feel that way makes me 5 feel sad. 6 Q. Okay. But is it then fair to 7 assume at this point that you were talking to 8 Patricia a lot about the things in London that 9 you liked? 10 A. I mean, I did like a lot of things 11 about London. 12 I'm like that, though. I just 13 went to Texas and I just talked for an hour about 14 what I liked. Like, I just talked for months 15 about what I liked about Texas and how much and 16 how great it was. 17 I do that no matter where I go 18 that's new. I'm very excitable, you know. Happy 19 person. 20 Q. Okay. This was during the period 21 of time that you were traveling, at least, 22 somewhat frequently to London, correct? 23 A. I don't know the date of this 24 particular one. I know you had it, but I didn't</p>	<p>Page 291</p> <p>1 Q. Yeah, I'm assuming that was a 2 joke, that Danny's midnight confessions thing? 3 A. Well, it was funny, because it's a 4 sex store. 5 Q. Right. 6 But more relevantly 12/28/18, 7 you're sending her a screen shot. Looks like -- 8 is that an Instagram screen shot? 9 A. No. It looks like a -- maybe it 10 is. I don't know. I guess maybe it is an 11 Instagram screen shot. 12 MR. CARSON: What are we talking 13 about, this right here? 14 THE DEPONENT: The screen shot. 15 It could be just from my phone. I don't 16 know if that is. I guess it looks like 17 Instagram. 18 BY MR. CAVALIER: 19 Q. Not that it matters. 20 But in any event, this is a 21 message that you got and screen captured from 22 Jasmine Bishop, correct? 23 A. Yes. 24 Q. Okay. And she's asking for a</p>

<p>1 chat?</p> <p>2 A. She's always asking for a chat.</p> <p>3 Q. Do you recall why you would have</p> <p>4 screen shot that and sent it to Patricia?</p> <p>5 A. Well, because I knew it was</p> <p>6 Danny's -- well, at the time I knew it was</p> <p>7 Danny's ex-girlfriend, whom he has kids with, and</p> <p>8 she's reaching out to me, which was always a pain</p> <p>9 in the butt.</p> <p>10 Q. Do you know whether this was the</p> <p>11 first time that she ever reached out to you?</p> <p>12 A. I don't remember the first time</p> <p>13 she reached out to me. Could have been before</p> <p>14 then. Could have been after. I don't know.</p> <p>15 Q. And she responds, oh, geez, did</p> <p>16 you talk to her, question mark.</p> <p>17 You said, not yet, but I will.</p> <p>18 She says, I'm dying to know what</p> <p>19 she wants to talk about.</p> <p>20 She says, so bizarre all around.</p> <p>21 So is it fair to say that at this</p> <p>22 point Patricia knew about your relationship with</p> <p>23 Danny and who Jasmine Bishop was?</p> <p>24 A. Yes.</p>	<p>Page 292</p> <p>1 Q. Okay.</p> <p>2 A. Like actually certifiable with a</p> <p>3 diagnosis insane.</p> <p>4 Q. So were you talking to Jasmine</p> <p>5 Bishop before you started a relationship with</p> <p>6 Danny Thomas?</p> <p>7 A. Yeah, I think so.</p> <p>8 Q. Okay. And just to tie this up.</p> <p>9 You're also sending Patricia the</p> <p>10 conversation you had with Danny about Jasmine</p> <p>11 Bishop's message here, correct?</p> <p>12 A. Right.</p> <p>13 Q. And this is McNulty 277.</p> <p>14 And you're asking Danny, do you</p> <p>15 want me to answer her.</p> <p>16 And he responds -- I'm assuming</p> <p>17 that's a typo, it says, yes, talk to her --</p> <p>18 A. That's how he talks. You talk to</p> <p>19 her, make her understand you're helping me with</p> <p>20 my development, PA to Tommy, et cetera.</p> <p>21 Q. And then a little sweaty guy</p> <p>22 emoji?</p> <p>23 A. That's a crying emoji.</p> <p>24 Q. Looks like he's crying out of his</p>
<p>Page 293</p> <p>1 Q. Okay. Is that something you</p> <p>2 discussed frequently?</p> <p>3 A. Occasionally. I mean -- here's</p> <p>4 the deal. I didn't engage in -- like, the first</p> <p>5 time I even ever, you know -- Danny tried to kiss</p> <p>6 me on October 23rd.</p> <p>7 I remembered the date, because me</p> <p>8 and my mom had left the next day for England.</p> <p>9 And then Danny was, you know,</p> <p>10 trying to court me, basically, over a certain</p> <p>11 amount of, like -- like months.</p> <p>12 And it was -- it was refreshing to</p> <p>13 hear wonderful things about yourself over and</p> <p>14 over and over again.</p> <p>15 And then I visited there</p> <p>16 afterwards. But there was no actual, like,</p> <p>17 relationship at that point.</p> <p>18 But Jaz had always asked me about</p> <p>19 lots of things. She asked me if he was sleeping</p> <p>20 with other girls. She heard rumors that he was</p> <p>21 doing this and doing that. And, like, before she</p> <p>22 even asked him about a relationship with me, she</p> <p>23 came to me about other chicks. So, I mean, she's</p> <p>24 crazy.</p>	<p>Page 295</p> <p>1 scalp to me.</p> <p>2 But I'll take your word for it.</p> <p>3 You certainly would know better than me.</p> <p>4 So why -- what does that mean?</p> <p>5 A. He wanted -- like, so she's -- Jaz</p> <p>6 was always so crazy and jealous.</p> <p>7 I remember one time we were out</p> <p>8 with, like, Tommy. And this was before, again,</p> <p>9 anything happened.</p> <p>10 And they weren't even together,</p> <p>11 because they break up and on and off again all</p> <p>12 the time.</p> <p>13 That she made Danny show her his</p> <p>14 location and Facetime her immediately, so she</p> <p>15 knew exactly where he was.</p> <p>16 He's like, we don't even live</p> <p>17 together. Like, I'm living in London. She was</p> <p>18 always just like that. She would threaten her</p> <p>19 own life and the kids and whatever.</p> <p>20 So I was like, do you want me to</p> <p>21 talk to her, you know. And at this point,</p> <p>22 probably, I don't know what date this is, but we</p> <p>23 didn't like, you know, -- what date was this</p> <p>24 thing? Like, yeah, this is still November. I</p>



<p>1 don't know when I went over there.  2 Q. End of December.  3 A. Beginning of December.  4 Yeah, so, like, we weren't -- we  5 didn't have a physical relationship at this  6 point. And I really was trying to help Danny  7 grow and be better as a person and, like -- yeah,  8 I mean, that's all -- that's all accurate.  9 Q. You didn't have a physical  10 relationship with Danny Thomas at the end of  11 December of 2018?  12 A. At the end of December I did,  13 yeah, yeah, yeah. I thought this was dated  14 November.  15 Q. I think it's dated 12/28.  16 A. Oh, I was looking at 11/20. Oh,  17 yeah, so I probably did have a romantic  18 relationship with him at this point.  19 Q. Okay.  20 A. Again, I definitely did if that's  21 the end of December, yeah.  22 Q. So he's saying, talk to Jasmine  23 and you know --  24 A. Which I was doing all those</p>	<p>Page 296</p>	<p>1 grant programs and there's this and that, like  2 through England's social services program.  3 It can build you up and you don't  4 need to rely on anybody. Like, I did nothing --  5 there was times that she really infuriated me,  6 but I would also still try to help this girl,  7 because her situation was tragic. And this is  8 when I was starting to realize how bad news Danny  9 was.  10 Q. Right.  11 And we talked about this during  12 your last deposition. I don't want to belabor  13 the point.  14 But you just mentioned that  15 sometimes she would drive you crazy. I think you  16 said sometimes she'd make you furious. I mean,  17 you guys got into it pretty heatedly at points,  18 yes?  19 A. Do you know that she was already  20 blowing up my phone and private messages last  21 week? I didn't answer her. Like, that girl's  22 crazy.  23 Q. She reached out to you last week?  24 A. Huh?</p>	<p>Page 298</p>
<p>1 things. That's true.  2 Q. Right. Right.  3 But he's saying, talk to her and  4 make her understand that nothing's going on  5 between us.  6 A. Just calm her down. Because he  7 was saying that she was, like, she threatens  8 to -- and he's told me this on numerous  9 occasions, that Jaz threatens to kill herself,  10 that she threatens to OD, that she takes it out  11 on the kids.  12 They both confirmed these things  13 back and forth. I mean, this was, like, a whole  14 unfortunate saga. But, like, Jasmine sent me  15 pictures of her face and feet beaten to a pulp  16 accusing Danny of it.  17 So, you know, she was like, I'm  18 not staying with him. Blah, blah, blah.  19 Like, there were so many things  20 that were involved in this crazy relationship  21 they had that, like, you know, I just wanted her  22 to have -- and in other texts, I even tried to  23 help, say go get a job. If you reach out to  24 these people, like, in your community, there's</p>	<p>Page 297</p>	<p>1 Q. She messaged you last week?  2 A. She sent me, like, a request for  3 thing. I never responded.  4 Q. Okay. And at certain points, you  5 guys made threats against each other, correct?  6 A. No.  7 Q. All right. We can talk a little  8 bit more about that.  9 But what I really want to know is,  10 did it concern you at all that she was, as I  11 think you put it, certifiably insane with a  12 diagnosis, and was involved with this person who  13 you had a relationship with? Did that concern  14 you?  15 A. It's called life.  16 Q. What does that mean?  17 A. I mean, like --  18 MR. CARSON: The question is, did  19 it concern you? Yes or no. Did it  20 concern you?  21 THE DEPONENT: No. He asked what  22 that means. It didn't. That did not  23 concern me. That's life.  24</p>	<p>Page 299</p>

<p>Page 300</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Did you ever have a concern that</p> <p>3 she was going to hurt Danny?</p> <p>4 A. No.</p> <p>5 Q. Did you ever have a concern that</p> <p>6 she was gonna try to hurt you?</p> <p>7 A. No.</p> <p>8 Q. Did you ever have a concern that</p> <p>9 she was going to try to hurt her kids because of</p> <p>10 your relationship with Danny?</p> <p>11 A. It's all a lot of drama.</p> <p>12 MR. CARSON: Yes or no.</p> <p>13 THE DEPONENT: I don't remember is</p> <p>14 my answer.</p> <p>15 MR. CARSON: Did you ever have a</p> <p>16 concern that she hurt her kids,</p> <p>17 because --</p> <p>18 THE DEPONENT: I don't remember.</p> <p>19 I just said it again. I don't remember.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Okay. So there were times when</p> <p>22 you insulted her over messaging, correct?</p> <p>23 A. Yes.</p> <p>24 Q. So if she was certifiably insane,</p>	<p>Page 302</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Are you gonna abide by your</p> <p>3 counsel's objection?</p> <p>4 A. I don't remember the question</p> <p>5 honestly.</p> <p>6 Q. The question is, do you think you</p> <p>7 overreacted?</p> <p>8 MR. CARSON: Objection. Do not</p> <p>9 answer.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. Since she already answered, I</p> <p>12 don't think we need to belabor that point.</p> <p>13 Same document. This is McNulty</p> <p>14 291.</p> <p>15 She texts you here.</p> <p>16 Boo, I'm definitely going to start</p> <p>17 looking, fuck this underappreciated bullshit.</p> <p>18 In January 2019, do you know</p> <p>19 whether Patricia McNulty was actively looking for</p> <p>20 another job?</p> <p>21 A. I don't remember.</p> <p>22 Q. In January of 2019, were you</p> <p>23 looking for another job?</p> <p>24 A. I don't remember.</p>
<p>Page 301</p> <p>1 what was the -- what was the goal that you had in</p> <p>2 mind in lobbing those insults at her?</p> <p>3 MR. CARSON: Objection. Are you</p> <p>4 representing Jasmine Bishop now?</p> <p>5 THE DEPONENT: I have sometimes an</p> <p>6 extraordinarily -- extraordinary drive to</p> <p>7 defend myself.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. Okay. Sitting here today, do you</p> <p>10 think maybe you overreacted?</p> <p>11 MR. CARSON: Objection,</p> <p>12 argumentative. You don't have to answer</p> <p>13 that.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. What was the answer?</p> <p>16 MR. CARSON: I'm instructing her</p> <p>17 not to answer.</p> <p>18 MR. CAVALIER: She already</p> <p>19 answered. I just --</p> <p>20 MR. CARSON: I didn't hear her,</p> <p>21 but I'm objecting based on -- the</p> <p>22 question is argumentative only, designed to</p> <p>23 embarrass, ridicule and harass.</p> <p>24</p>	<p>Page 303</p> <p>1 Q. A little further down you send</p> <p>2 the -- I don't know what you want to call that,</p> <p>3 the --</p> <p>4 A. Shocked face.</p> <p>5 Q. The what face?</p> <p>6 A. Shocked.</p> <p>7 Q. Shocked face. Okay.</p> <p>8 A. That's a surprise face.</p> <p>9 Q. Surprise face, that works.</p> <p>10 And then you send her, looks like</p> <p>11 a photograph of a computer screen from someone</p> <p>12 named Will Chamberlain, sending you a friend</p> <p>13 request on Facebook.</p> <p>14 A. Uh-huh.</p> <p>15 Q. So -- and then a laugh -- cry,</p> <p>16 laughing emoji.</p> <p>17 Can you explain to me what you</p> <p>18 guys were talking about there?</p> <p>19 A. I have no idea.</p> <p>20 Q. Who's Will Chamberlain?</p> <p>21 A. He's a reporter -- not a reporter.</p> <p>22 He's like a lawyer and he owns a publication.</p> <p>23 Q. Okay. And here she says, a very</p> <p>24 long, loud laugh, I guess you could call that.</p>

<p>Page 304</p> <p>1 Says, guess you couldn't have been that bad. And</p> <p>2 you say, it was bad in the morning.</p> <p>3 What are you referring to?</p> <p>4 A. Maybe the night that we hung out</p> <p>5 on New Year's Eve and I got drunk and probably</p> <p>6 didn't like what I said or something. I don't</p> <p>7 know.</p> <p>8 Q. Did you have a sexual relationship</p> <p>9 with Will Chamberlain?</p> <p>10 MR. CARSON: I'm instructing her</p> <p>11 not to answer that question, designed to</p> <p>12 embarrass and harass. No relevance.</p> <p>13 MR. CAVALIER: We disagree on</p> <p>14 relevance. I think it's an improper</p> <p>15 instruction. But we'll decide if we need</p> <p>16 to do anything about that later.</p> <p>17 THE DEPONENT: Okay.</p> <p>18 MR. CARSON: There's only one</p> <p>19 reason to delve into her sex life.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Same document. McNulty 292.</p> <p>22 This is a screen shot of a</p> <p>23 conversation with Danny Thomas, correct?</p> <p>24 A. Yeah.</p>	<p>Page 306</p> <p>1 cleared.</p> <p>2 Then that Thursday came and then</p> <p>3 he didn't. And then the next day came and he</p> <p>4 didn't pay me back.</p> <p>5 So at this point I was thinking,</p> <p>6 I'm never gonna freakin see the money I lent him</p> <p>7 anyway, so just screw it.</p> <p>8 Q. After that you say to Patricia,</p> <p>9 I'm so hot right now, I'm about to say, expect</p> <p>10 those dick pics any day.</p> <p>11 What does that mean?</p> <p>12 A. I don't know what it really means.</p> <p>13 Hot means angry.</p> <p>14 Q. Right.</p> <p>15 A. I don't know what I meant by</p> <p>16 expect those dick pics any day.</p> <p>17 Oh, because he -- because that's</p> <p>18 how Danny would try to make up with things. He</p> <p>19 would try to send pictures of his thing, like,</p> <p>20 hey, baby, I want you, so...</p> <p>21 Q. Okay. So explain then your text</p> <p>22 to Tricia. I'm not sure I follow how that</p> <p>23 relates.</p> <p>24 A. Because that's what he does. It's</p>
<p>Page 305</p> <p>1 Q. You say to him, I'm telling you</p> <p>2 right now, don't ever call me again and don't let</p> <p>3 me see you in Brussels.</p> <p>4 He responds, I LOL.</p> <p>5 You say, I mean it. You can keep</p> <p>6 the money.</p> <p>7 A. Right.</p> <p>8 Q. What are you talking about there?</p> <p>9 A. So right before Christmas, Danny</p> <p>10 Thomas sent me a text message and it is said,</p> <p>11 hey, and he showed me a screen shot of flights.</p> <p>12 And he's like, I need to ask a big favor. He</p> <p>13 said I need to ask a little favor. I said, it</p> <p>14 looks like a big one to me.</p> <p>15 I said, what is it?</p> <p>16 He said, I need to go to Germany</p> <p>17 with Tommy. And my Monday is coming in from</p> <p>18 Paypal and -- my money is coming in from Paypal,</p> <p>19 like from donations that he was getting from</p> <p>20 whatever he was doing. But he sent me a screen</p> <p>21 shot and said, see, it doesn't clear til here.</p> <p>22 And I said, fine. I'll send it to</p> <p>23 you, but make sure you pay me back on Thursday</p> <p>24 when it clears. Because the thing said it</p>	<p>Page 307</p> <p>1 like a routine. It's kind of, like, you know how</p> <p>2 like if you were to fight with somebody and they</p> <p>3 have like a thing that they always do. Like</p> <p>4 Vasilie will be like, you know, if I got in an</p> <p>5 argument with him in two days, he would get me,</p> <p>6 like, flowers from -- where would he get my</p> <p>7 flowers from? What do call it?</p> <p>8 MR. CARSON: I would go with the</p> <p>9 guys gets you flowers versus sending you</p> <p>10 dick pics.</p> <p>11 THE DEPONENT: Stop. You know</p> <p>12 what I am saying. But Vasilie would get</p> <p>13 mad and he'd get me flowers from Whole</p> <p>14 Foods. And if we're fighting, I'd be</p> <p>15 like, I'd better expect those flowers,</p> <p>16 like.</p> <p>17 That's just what that is. It's</p> <p>18 like a joke.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. I see. I see what you're saying.</p> <p>21 So you're not -- you're not --</p> <p>22 you're not saying here, like, hey, Danny, expect</p> <p>23 dick pics any day.</p> <p>24 What you're really saying is,</p>

<p style="text-align: right;">Page 308</p> <p>1 like, you're being and asshole and I expect you</p> <p>2 to apologize?</p> <p>3 A. Yeah. But I didn't even send it</p> <p>4 to him. I sent it to her. But like that's the</p> <p>5 joke, yeah.</p> <p>6 Q. Right. I got it.</p> <p>7 A. Oh, and then she says, you can't</p> <p>8 do that, he's got hot pictures of you, too. But,</p> <p>9 like, I wasn't threatening that.</p> <p>10 Q. Okay. I mean, in fairness,</p> <p>11 though, if you continue to read down here, it</p> <p>12 seems like you're pretty angry, though, right?</p> <p>13 A. Oh, definitely angry. I forget</p> <p>14 what I was angry about. But I was angry at Danny</p> <p>15 a lot, so yeah.</p> <p>16 This is a continuation of that</p> <p>17 conversation with him. The deal is like, thanks,</p> <p>18 Babe. Sorry. Stop.</p> <p>19 Q. Right.</p> <p>20 So you're saying -- you're making</p> <p>21 a threat to him here where you say, if you -- if</p> <p>22 you make me angrier --</p> <p>23 A. Oh, I'm gonna tell Jaz. Yeah.</p> <p>24 Q. Right.</p>	<p style="text-align: right;">Page 310</p> <p>1 know, hey, Lis, what do you think about this</p> <p>2 idea, what do you think about that? What do you</p> <p>3 think about -- how was that video? Can you help</p> <p>4 me edit this video?</p> <p>5 Then, like, he wanted to interview</p> <p>6 these people in Paris and he started interviewing</p> <p>7 the people in Paris.</p> <p>8 So then he gave me the footage to,</p> <p>9 like, help edit. So I edited the footage for</p> <p>10 him, like, as a favor, and he wound up never even</p> <p>11 putting it on YouTube.</p> <p>12 Like so I did work for nothing.</p> <p>13 Q. Okay.</p> <p>14 A. I helped him all the time. And I</p> <p>15 counseled him and I would tell him, hey, you</p> <p>16 spelled that wrong, delete that. Or I would fix</p> <p>17 his tweets or whatever he needed.</p> <p>18 I mean, over and over again I</p> <p>19 helped that kid.</p> <p>20 Q. Okay. And that that included</p> <p>21 helping him with money, yes?</p> <p>22 A. Only that one time. That was the</p> <p>23 only time I ever helped him with money was --</p> <p>24 well, I also in Brussels, one time, because he</p>
<p style="text-align: right;">Page 309</p> <p>1 And then you say to him, you have</p> <p>2 no right to treat me with disrespect like that</p> <p>3 after I've done fucking everything for you.</p> <p>4 To your point he says, well,</p> <p>5 thanks, babe. And you say, don't fucking babe</p> <p>6 me.</p> <p>7 You're having a go at me for</p> <p>8 someone talking shit.</p> <p>9 Do you have anything -- does this</p> <p>10 help you remember what this dispute was about?</p> <p>11 A. I don't remember what that dispute</p> <p>12 was about. Probably like him being on Snapchat</p> <p>13 and sending D pics to girls.</p> <p>14 Q. Do you know what you mean here</p> <p>15 when you say, I've done fucking everything for</p> <p>16 you?</p> <p>17 A. Yeah, I'll tell you what I did for</p> <p>18 that kid.</p> <p>19 Every time he needed help on</p> <p>20 anything, Lisa, how does this video sound. He</p> <p>21 would ask me to, like, review his YouTube videos.</p> <p>22 He would ask me for advice on everything.</p> <p>23 He would, you know, like, ask me</p> <p>24 to help him with all kinds of things. Like, you</p>	<p style="text-align: right;">Page 311</p> <p>1 was embarrassing me, I helped him with money.</p> <p>2 But I lent him money there. And</p> <p>3 the only time I ever gave money -- or anything to</p> <p>4 Danny without expectation of return is when he</p> <p>5 had clothes and we were going out to dinner and</p> <p>6 he looked like crap. And I said, go get a</p> <p>7 blazer. I don't have time for this. I've got to</p> <p>8 get ready.</p> <p>9 So that is the only time that</p> <p>10 there's ever been money between Danny and I.</p> <p>11 Q. Okay.</p> <p>12 A. And there is, you know, like --</p> <p>13 well, whatever.</p> <p>14 (Deposition Exhibit E marked.)</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. This is a new exhibit. I think</p> <p>17 it's Exhibit E.</p> <p>18 Can you read that or is that too</p> <p>19 small?</p> <p>20 A. It's small, but if I get close</p> <p>21 enough, I'm getting it. If you want to enlarge</p> <p>22 it, though, that would be helpful.</p> <p>23 Q. We'll blow it up and take it in</p> <p>24 pieces.</p>



<p>Page 312</p> <p>1 A. Okay.</p> <p>2 Q. As you can see here, based on what</p> <p>3 I'm highlighting, this is a production from your</p> <p>4 phone.</p> <p>5 A. Right. On What's App to somebody</p> <p>6 in England.</p> <p>7 Q. Whose number is this?</p> <p>8 A. I don't know. I don't remember.</p> <p>9 I don't know numbers off the top of my head. I'm</p> <p>10 sure you'll tell me.</p> <p>11 Q. If I represent to you that that's</p> <p>12 Tommy Robinson's number, do you have any reason</p> <p>13 to doubt that?</p> <p>14 A. Probably not.</p> <p>15 Q. Okay. You see here that these</p> <p>16 conversations took place, with the exception of</p> <p>17 the last one, on March 7, 2019?</p> <p>18 A. Okay. I'm, like, getting down</p> <p>19 here so I can read it. Can you move over though,</p> <p>20 so I can read what the actual messages are?</p> <p>21 Q. Yeah, actually I'm looking at</p> <p>22 these now. They're from two different people. I</p> <p>23 don't want to mislead you. So I want to be clear</p> <p>24 here.</p>	<p>Page 314</p> <p>1 MR. CARSON: Still can't see all</p> <p>2 the words.</p> <p>3 THE DEPONENT: Yeah.</p> <p>4 MR. CARSON: You got to move it</p> <p>5 over more.</p> <p>6 MR. CAVALIER: That's weird. You</p> <p>7 can see it on my screen.</p> <p>8 THE DEPONENT: There you go. Now</p> <p>9 you're good.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. Can you read the first three</p> <p>12 messages for me?</p> <p>13 A. Yes. But just so I want to be</p> <p>14 clear here, because I just read them while we</p> <p>15 here -- like I said, I read fast -- those</p> <p>16 messages, there are messages -- lots of messages</p> <p>17 missing in between and after them.</p> <p>18 Q. Okay.</p> <p>19 A. Because I remember this</p> <p>20 conversation. Lots of messages missing in</p> <p>21 between them.</p> <p>22 Q. Right.</p> <p>23 And by the way, I'm not -- I'm</p> <p>24 not -- I'm not trying to represent to you that</p>
<p>Page 313</p> <p>1 This number here, I'm gonna</p> <p>2 represent to you that's Jasmine Bishop's number.</p> <p>3 Does that ring a bell?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay. And I want to represent to</p> <p>6 you that these numbers here are from Tommy</p> <p>7 Robinson.</p> <p>8 Do you see that?</p> <p>9 A. Okay.</p> <p>10 Q. Do you see that distinction</p> <p>11 between the two numbers?</p> <p>12 A. Yeah, I do.</p> <p>13 Q. So what I want to talk about are</p> <p>14 these messages at --</p> <p>15 A. Uh-huh.</p> <p>16 Q. -- over here. So, again, you can</p> <p>17 still see the numbers here, so we can reference</p> <p>18 these first three as being from --</p> <p>19 A. I get it. Can you move over so I</p> <p>20 can read all the words?</p> <p>21 Q. Sure. I just wanted to make</p> <p>22 sure you saw which numbers are which.</p> <p>23 A. I get it. The first three are</p> <p>24 hers.</p>	<p>Page 315</p> <p>1 these are a continuous stream of messages in any</p> <p>2 way.</p> <p>3 Okay?</p> <p>4 A. Well, but to understand these</p> <p>5 messages, you need the messages that correspond</p> <p>6 with them.</p> <p>7 Q. That's fine. And we can talk</p> <p>8 about that later if we need to.</p> <p>9 But I don't think I need to do</p> <p>10 that to ask these simple specific questions.</p> <p>11 A. Okay.</p> <p>12 Q. I note for the record, too, that</p> <p>13 again, these messages were produced to us in this</p> <p>14 way, so it's not that we are -- we didn't</p> <p>15 manufacture this document.</p> <p>16 We didn't set it up or create it</p> <p>17 this way. It's the way --</p> <p>18 A. They -- but you have the entire</p> <p>19 text string from these. Like Kep Secum does or</p> <p>20 whatever. And you have the ability to put these</p> <p>21 in correct context.</p> <p>22 Q. Maybe. I don't know that I would</p> <p>23 agree with you there.</p> <p>24 But for the sake of this</p>

<p>Page 316</p> <p>1 deposition, this is the way we're gonna try to</p> <p>2 walk through it.</p> <p>3 I'm just curious as to whether you</p> <p>4 know, looking at this, what these text messages</p> <p>5 refer to.</p> <p>6 And specifically I'm talking about</p> <p>7 the first three -- again, not a continuous</p> <p>8 string. Three separate messages.</p> <p>9 Do you know what they're referring</p> <p>10 to?</p> <p>11 A. Yes.</p> <p>12 Q. What are they referring to?</p> <p>13 A. Jasmine was mad at Danny for</p> <p>14 something, either it was me or a new girl or</p> <p>15 something. I don't remember the exact thing.</p> <p>16 But she started to say that Danny</p> <p>17 stole money from MEF. This is a claim that, you</p> <p>18 know, she throws out there.</p> <p>19 However, she throws lots of claims</p> <p>20 out there.</p> <p>21 And so she was trying to say --</p> <p>22 and I said, be careful -- what I was trying to</p> <p>23 tell her was, like, be careful, because these are</p> <p>24 serious allegations. This is what you would hear</p>	<p>Page 318</p> <p>1 the one here says, but not that he got it from</p> <p>2 MEF money.</p> <p>3 And so what you're saying -- what</p> <p>4 you're missing in between those two, not that he</p> <p>5 got it from MEF money, she was telling me about</p> <p>6 the apartment that they moved in -- like the new</p> <p>7 house that they moved into and that he got a car.</p> <p>8 And then she walked back her</p> <p>9 claims. And she said, well, I just got off the</p> <p>10 phone with his mother. And apparently they gave</p> <p>11 him the money for the car. And I didn't know</p> <p>12 about that. I guess they didn't want me to know.</p> <p>13 So this is me trying to get her to</p> <p>14 give me evidence, because it is, it's me trying</p> <p>15 to show her, like, yo, this is a substantial</p> <p>16 claim that you're making. And I -- and I would</p> <p>17 want, as a moral responsibility, to tell my</p> <p>18 employer about this.</p> <p>19 But I need the evidence. And</p> <p>20 you're missing the part where I ask her for</p> <p>21 evidence and she walks back her claim.</p> <p>22 Q. What did you mean here when you</p> <p>23 said to her, it was always in the back of my</p> <p>24 mind, because it didn't add up?</p>
<p>Page 317</p> <p>1 from the beginning of this conversations.</p> <p>2 Be careful because they are</p> <p>3 serious allegations. She said something else. I</p> <p>4 don't remember what it was.</p> <p>5 And here it says, and I didn't</p> <p>6 know about the money that he took from MEF until</p> <p>7 you told me.</p> <p>8 It was always in the back of my</p> <p>9 mind, because it didn't add up, the whole Vinny</p> <p>10 and you thing.</p> <p>11 But he said you were crazy and</p> <p>12 would do anything to destroy him. And I wanted</p> <p>13 to believe him.</p> <p>14 Now that I'm obligated to tell my</p> <p>15 work, what do I do? That's theft.</p> <p>16 And so I asked her, which you</p> <p>17 don't see in here, for proof.</p> <p>18 Give me something that I can go to</p> <p>19 my people about.</p> <p>20 And then she said something -- to</p> <p>21 the fact about, like, the house or some money she</p> <p>22 referenced.</p> <p>23 I said, that's \$7 he stole from</p> <p>24 MEF then and Tommy. And I said, but -- I said,</p>	<p>Page 319</p> <p>1 A. Because when the Vinny thing</p> <p>2 happened, remember? And we talked about this</p> <p>3 earlier. Vinny and this guy Jan, in the</p> <p>4 beginning, in June, had asked for payment for</p> <p>5 work that they did or didn't do and that was</p> <p>6 nevertheless.</p> <p>7 And there were e-mails back and</p> <p>8 forth from -- or maybe it was e-mails or -- I</p> <p>9 don't know where -- where the messages were from.</p> <p>10 But they were in writing somewhere. Between me</p> <p>11 and Danny about, you know, just pay these guys.</p> <p>12 And I had talked to Greg about it.</p> <p>13 And then -- and I said, Danny said, I spent --</p> <p>14 what he said to me at the point was, he was,</p> <p>15 like, you know, I put all the -- we were asking</p> <p>16 him to give, I think, 900 pounds to Jan -- I</p> <p>17 think those numbers are right -- to Jan and Vinny</p> <p>18 for whatever work or whatever.</p> <p>19 I said, it's just worth it to make</p> <p>20 it go away. Whatever is left over, pay them.</p> <p>21 And he goes, I already spent</p> <p>22 what's left over. So I told Greg he already</p> <p>23 spent what's left over. He doesn't have it left</p> <p>24 over. So you pay Jan and Vinny. And he did.</p>

<p>Page 320</p> <p>1 But I didn't understand why he</p> <p>2 didn't have 9,000 -- 900 pounds left over.</p> <p>3 So -- but that's not 7,000.</p> <p>4 That's 900.</p> <p>5 And Greg knew that. He took that</p> <p>6 extra money and that's why Greg and Marnie paid</p> <p>7 him -- paid Jan directly.</p> <p>8 Q. At the point in time here where</p> <p>9 you were conversing with Jasmine Bishop, was she</p> <p>10 living with Danny Thomas?</p> <p>11 A. He's in and out of there so much,</p> <p>12 I don't know.</p> <p>13 Q. Okay. They have kids together?</p> <p>14 A. He was not living there when I met</p> <p>15 him.</p> <p>16 Q. Right. No, I know.</p> <p>17 But do you know if they were</p> <p>18 living together in March?</p> <p>19 A. I don't.</p> <p>20 Q. So I ask because it talks about --</p> <p>21 you just talked about the fact that they moved</p> <p>22 into a new house.</p> <p>23 A. No. They moved into that house</p> <p>24 apparently in June.</p>	<p>Page 322</p> <p>1 it's not in Jasmine's best interests to tell you</p> <p>2 that the father of their mutual children may have</p> <p>3 stolen \$7,000 from your employer, correct?</p> <p>4 A. Did you ever hear --</p> <p>5 MR. CARSON: Object to the form of</p> <p>6 the question.</p> <p>7 You want her to speculate again</p> <p>8 here? You can --</p> <p>9 THE DEPONENT: Did you ever hear</p> <p>10 the saying there is no wrath as strong as</p> <p>11 a woman scorned?</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. I have, indeed, heard that saying.</p> <p>14 Many times as it relates to this case.</p> <p>15 A. So, you know, Jasmine was saying</p> <p>16 crazy things about lots of people.</p> <p>17 Jasmine, at one point, told me</p> <p>18 that she was going to make up lies about Tommy</p> <p>19 Robinson and go to the papers about them to get</p> <p>20 back at Danny.</p> <p>21 Well, that would cut off his</p> <p>22 income. But she didn't care about his income.</p> <p>23 She cared about him cheating on her. And if he</p> <p>24 was still out working for Danny Thomas -- or</p>
<p>Page 321</p> <p>1 Q. June of what?</p> <p>2 A. June of 2018.</p> <p>3 Q. You said 2018?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. And then -- whatever. And then he</p> <p>7 told me later that they moved into that house.</p> <p>8 But then he kicked her -- she</p> <p>9 kicked him out a bunch of times or he left a</p> <p>10 bunch of times.</p> <p>11 I mean, they were in and out all</p> <p>12 the time. I think they get their furniture from</p> <p>13 a charity shop and they live hard.</p> <p>14 Q. And as a matter of fact, that was</p> <p>15 one of the insults that you threw at Jasmine</p> <p>16 Bishop at one point?</p> <p>17 A. Probably.</p> <p>18 Q. Jasmine and Danny have kids</p> <p>19 together, right?</p> <p>20 A. Yeah. Three.</p> <p>21 Q. And like you just said, they live</p> <p>22 hard, right?</p> <p>23 A. Yeah.</p> <p>24 Q. So is it fair then to say that</p>	<p>Page 323</p> <p>1 working with Tommy Robinson, then he wouldn't be</p> <p>2 home.</p> <p>3 Q. So at this point in time -- and by</p> <p>4 this point in time, I mean March 7, 2019, you</p> <p>5 hear this from Jasmine and you then message Tommy</p> <p>6 Robinson, correct?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Okay. And after saying a couple</p> <p>9 things, you say, I'm going to walk away from all</p> <p>10 of this.</p> <p>11 I recently found out some</p> <p>12 potentially messy things. And I have to deal</p> <p>13 with demos MEF and I have to back away until I</p> <p>14 figure it all out.</p> <p>15 A. Right.</p> <p>16 Q. And I tell MEF, which I think I'm</p> <p>17 obligated to, it's not good. Plus I have Jaz</p> <p>18 harassing me. I'm out.</p> <p>19 A. Okay.</p> <p>20 Q. So at this point you brought up</p> <p>21 the potentially stolen money to Tommy Robinson,</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. So you thought -- you, at</p>

<p>1 least, thought enough of the allegation to raise 2 it with him? 3 A. At the time. 4 If you look at the date stamps, I 5 mean, it's the same day. 6 Q. Right. 7 A. I said, I don't know until I 8 figure it all out, because she walked back her 9 comments and I have to look into it. 10 Q. Right. 11 So how did you look into it? 12 A. She told me that she would send me 13 bank documents and statements and she never did. 14 Q. Did you -- so she didn't send you 15 this stuff. 16 But did you look into it in any 17 other way? 18 A. Well, I questioned Danny. And 19 this was part of the reason that I was 20 questioning Tommy, did he know anything about it. 21 I asked Danny himself. I asked Jaz again. 22 I mean, they're the only recourses 23 I have to figure it out at that point. 24 Q. Didn't you think that the Forum</p>	<p>Page 324</p> <p>1 So we're aware of that. 2 Is that what you're talking about? 3 MR. CAVALIER: Are you also aware 4 that Danny Thomas has stated clearly and 5 unequivocally that no bribe or other 6 compensation was offered for any 7 testimony in this case? 8 MR. CARSON: Yeah, no, that didn't 9 happen. 10 MR. CAVALIER: Okay. 11 MR. CARSON: Yeah. And you show 12 me -- you show me a statement in this 13 case where Danny Thomas admitted to it. 14 That's not part of this case. 15 THE DEPONENT: Anyway, to your 16 question, I still do not know if that 17 money was taken. 18 I have no evidence that it was 19 takenI have no proof. And I would love 20 to see evidence if that was the case. 21 MR. CARSON: Did Danny Thomas 22 return the money? Has the Forum asked 23 for it to be returned? 24 MR. CAVALIER: I'll ask questions.</p> <p>Page 326</p>
<p>1 might have resources that could help you figure 2 it out? 3 A. I didn't want to involve the Forum 4 in a baseless rumor if that was the case. 5 You don't just go spreading rumors 6 and making trouble that are unnecessary. 7 Trust me, Greg wouldn't have loved 8 that. 9 Q. Just to be clear, it's a rumor 10 that turned out to be true, right? 11 MR. CARSON: Whoa, whoa, whoa. 12 Objection. 13 What do you mean it turned out to 14 be true? What are you talking about? 15 BY MR. CAVALIER: 16 Q. You're aware that Danny Thomas has 17 admitted to taking that money, right? 18 MR. CARSON: No. I'm not aware 19 of. 20 What we are aware of is that Danny 21 Thomas saying that Greg called him on the 22 phone and said that if you admit to it, 23 we'll sort you out afterwards with a wink 24 and a nod.</p> <p>Page 325</p>	<p>1 MR. CARSON: Yeah. 2 BY MR. CAVALIER: 3 Q. Does the fact that the Forum is 4 pursuing avenues of legal relief against Danny 5 Thomas change your answer to my last question? 6 MR. CARSON: Objection. Assuming 7 facts not in evidence. 8 Show me that, too. 9 THE DEPONENT: Doesn't matter what 10 it is. I still to this day, and at the 11 time of this text messages, and at the 12 time that I worked at MEF, I didn't know 13 if he took the money or not. 14 And it turned out to be true, it 15 turned out to be true. But I'm not going 16 around making claims without evidence. 17 BY MR. CAVALIER: 18 Q. Because it's important to have 19 really solid evidence before you accuse someone 20 of wrongdoing, correct? 21 MR. CARSON: There's been 22 extensive discovery done. I haven't 23 received any documents from anybody 24 showing that there's been an admission</p> <p>Page 327</p>



<p>Page 328</p> <p>1 made or that there's been unequivocal --</p> <p>2 we have a recording from Danny Thomas of</p> <p>3 an amount that we produced to you.</p> <p>4 If you have more stuff to produce</p> <p>5 in discovery, I don't know that -- I</p> <p>6 don't know that you can produce it at</p> <p>7 this point.</p> <p>8 But we will certainly look at it</p> <p>9 and then make a decision how to handle</p> <p>10 it.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. The question is, it's important to</p> <p>13 have really solid evidence before accusing</p> <p>14 someone of wrongdoing, correct?</p> <p>15 A. Agree.</p> <p>16 Q. Especially criminal wrongdoing?</p> <p>17 A. Yeah.</p> <p>18 Q. Correct?</p> <p>19 A. Yes.</p> <p>20 MR. CARSON: We're in the MEF</p> <p>21 cinematic again with those questions?</p> <p>22 Object to form. Hypothetical.</p> <p>23 Those questions are based on</p> <p>24 something that never happened.</p> <p>Page 329</p> <p>1 MR. CAVALIER: Oh.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. As your attorney put it, as part</p> <p>4 of the Middle East Forum cinematic universe, this</p> <p>5 is your complaint in this case. Your amended</p> <p>6 complaint.</p> <p>7 And looking at page 486, you</p> <p>8 allege that defendants have manufactured false</p> <p>9 evidence in their coordinated retaliatory attack</p> <p>10 on plaintiff Lisa Barbounis.</p> <p>11 Did I read that correctly?</p> <p>12 A. Correct.</p> <p>13 Q. And in paragraph 47, you allege</p> <p>14 the defendants have engaged in criminal conduct</p> <p>15 by promising to pay for testimony in their</p> <p>16 coordinated retaliatory attack on Lisa Barbounis.</p> <p>17 Did I read that correct?</p> <p>18 A. Yep.</p> <p>19 Q. And in paragraph 48, you say,</p> <p>20 defendants have provided false and misleading</p> <p>21 information to potential witnesses in order to</p> <p>22 incite retaliatory behavior.</p> <p>23 Did I read that correct?</p> <p>24 A. Correct.</p>	<p>Page 330</p> <p>1 Q. I'll ask you first.</p> <p>2 Do you stand by all three of those</p> <p>3 statements?</p> <p>4 A. Yes.</p> <p>5 Q. And is the entire basis that you</p> <p>6 have for making those statements the recording of</p> <p>7 Danny Thomas speaking to Tommy Robinson that your</p> <p>8 attorney just referenced?</p> <p>9 A. There's more.</p> <p>10 Q. What's the more?</p> <p>11 A. Manufactured evidence.</p> <p>12 We were in a deposition and Greg,</p> <p>13 in our own deposition, compiled and manufactured</p> <p>14 evidence and Mr. Gold admitted at the end of the</p> <p>15 thing that we were right.</p> <p>16 And that was the direct -- that is</p> <p>17 the direct definition of manufacturing evidence.</p> <p>18 Q. So your testimony -- your</p> <p>19 testimony here today is that part of your -- the</p> <p>20 basis for your allegation in paragraph 46 is the</p> <p>21 fact that recordings between you and Jasmine</p> <p>22 Bishop were compiled together into a single</p> <p>23 recording?</p> <p>24 A. No.</p> <p>Page 331</p> <p>1 MR. CARSON: Objection. That's</p> <p>2 not what she just said.</p> <p>3 Go ahead. You can answer.</p> <p>4 THE DEPONENT: No. That's what I</p> <p>5 was trying to say. No. That is not what</p> <p>6 I said.</p> <p>7 I said that Greg took bits and</p> <p>8 pieces of multiple different</p> <p>9 conversations, mended them together in</p> <p>10 the worst possible light and used it as</p> <p>11 evidence.</p> <p>12 And then even Sidney Gold -- and</p> <p>13 we said, hey, this a compilation. You</p> <p>14 can't do that.</p> <p>15 And Sidney Gold even said at the</p> <p>16 end, you were right and I am sorry.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. You said use that as evidence, all</p> <p>19 that was done with that document was you were</p> <p>20 just asked questions about it, correct?</p> <p>21 A. No.</p> <p>22 MR. CARSON: The record speaks for</p> <p>23 itself.</p> <p>24 THE DEPONENT: I suggest you look</p>
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<p>1 it up, sir, because you can ask your --</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Well, you're calling -- you're</p> <p>4 saying manufactured false evidence in a</p> <p>5 coordinated retaliatory attack.</p> <p>6 How is that evidence --</p> <p>7 A. One of the ways that they did</p> <p>8 that --</p> <p>9 MR. CARSON: It's also not an</p> <p>10 exclusive list. And she has an attorney</p> <p>11 who helps her draft these things. And</p> <p>12 she already told you she stands by</p> <p>13 everything.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. So you agree with me, though, that</p> <p>16 you have alleged that the Middle East Forum has</p> <p>17 engaged in criminal conduct by promising to pay</p> <p>18 for testimony in a coordinated retaliatory attack</p> <p>19 against you, correct?</p> <p>20 A. First of all, apparently Danny was</p> <p>21 bragging all over England that Greg was going to</p> <p>22 pay him. So I don't know if he retracted his</p> <p>23 statement or didn't.</p> <p>24 But, you know, multiple accounts</p>	<p>Page 332</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Did they record it on an audiotape</p> <p>3 and mail it to you? Did they text it to you?</p> <p>4 Did they e-mail it to you?</p> <p>5 A. They texted it to me.</p> <p>6 Q. Texted it to you.</p> <p>7 Who texted it to you?</p> <p>8 A. Tommy Robinson or Danny Barker. I</p> <p>9 forget which one it was.</p> <p>10 Q. Did they say anything about it?</p> <p>11 A. No, not that I recall. I don't</p> <p>12 remember.</p> <p>13 Q. Out of the blue, through an audio</p> <p>14 recording, via text and left it at that?</p> <p>15 A. They know that I'm a good person.</p> <p>16 And that Danny Thomas is a freakin liar. And</p> <p>17 they think what is being done to me is horrific.</p> <p>18 Q. Did he say that to you?</p> <p>19 A. People say that all the time. I</p> <p>20 get tons of messages all the time. And I'm sure</p> <p>21 that that person said that.</p> <p>22 Q. When you say that person, are we</p> <p>23 talking about Tommy Robinson?</p> <p>24 A. I don't remember. It was Tommy or</p>
<p>Page 333</p> <p>1 from multiple people say Danny was bragging all</p> <p>2 over that he was gonna get paid to testify</p> <p>3 against me.</p> <p>4 Q. Isn't it true that you had more</p> <p>5 information and evidence that Danny Thomas had</p> <p>6 stolen money from the Middle East Forum in March</p> <p>7 of 2019 than you do to support your claim that</p> <p>8 MEF has engaged in criminal conduct against you?</p> <p>9 MR. CARSON: Objection.</p> <p>10 Argumentative. Assuming facts not in</p> <p>11 evidence. Object to the form.</p> <p>12 THE DEPONENT: No.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. How did you get the recording</p> <p>15 between Danny Thomas and Tommy Robinson?</p> <p>16 A. It was a friend in England gave it</p> <p>17 to me.</p> <p>18 Q. How?</p> <p>19 A. They sent it.</p> <p>20 MR. CARSON: What do you mean how?</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Sent it to you how?</p> <p>23 MR. CARSON: Wait a minute. What</p> <p>24 do you mean how?</p>	<p>Page 334</p> <p>1 Danny Barker.</p> <p>2 Q. You don't remember who sent you</p> <p>3 the audio recording --</p> <p>4 A. There were two people -- excuse</p> <p>5 me. There were two people that I was talking to</p> <p>6 about it. And I don't remember exactly which one</p> <p>7 it was. I'm thinking it was Tommy, but I'm not a</p> <p>8 hundred percent sure.</p> <p>9 Q. Okay. So regardless of who sent</p> <p>10 it to you, you've talked about the audio</p> <p>11 recording with Tommy, correct?</p> <p>12 A. Yeah.</p> <p>13 Q. And you said you also talked about</p> <p>14 the audio recording with Barker, correct?</p> <p>15 A. Correct.</p> <p>16 Q. Is there any reason why you</p> <p>17 haven't turned over those communications?</p> <p>18 MR. CARSON: Objection. She said</p> <p>19 she talked to them. What communications?</p> <p>20 She didn't record the conversations.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Did you talk to them by text?</p> <p>23 A. No. I talked to them on the</p> <p>24 phone.</p>

<p>Page 336</p> <p>1 Q. But who sent you the recording by 2 text?</p> <p>3 A. Probably Tommy.</p> <p>4 Q. Right.</p> <p>5 A. That doesn't mean he texted me 6 about it. We called and he goes, I'll send it to 7 you.</p> <p>8 Q. Okay. Is there a reason you 9 haven't produced the text messages --</p> <p>10 MR. CARSON: I did. We sent you 11 the recordings.</p> <p>12 THE DEPONENT: We sent you the 13 recordings. That's it.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. You didn't produce any text 16 message that shows him sending it to you.</p> <p>17 MR. CARSON: Objection. 18 Argumentative.</p> <p>19 THE DEPONENT: We produced the 20 evidence.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. You produced the recording.</p> <p>23 MR. CARSON: Correct.</p> <p>24 Where are we going right now?</p>	<p>Page 338</p> <p>1 The time is 4:49 p.m.</p> <p>2 We are back on the record.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. So earlier you testified that you 5 did not -- you do not believe that you ever had a 6 fiduciary duty to the Middle East Forum, is that 7 correct?</p> <p>8 A. Correct.</p> <p>9 Q. Do you think you had a duty to 10 report your suspicions that Danny Thomas stole 11 money from the Forum, even if those suspicions 12 ultimately turned out to be incorrect?</p> <p>13 MR. CARSON: Objection. She never 14 testified that she had suspicions.</p> <p>15 You can answer.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Well, let me strike that question. 18 Back up a little bit.</p> <p>19 You had suspicions that Danny 20 Thomas stole money from the Middle East Forum, 21 correct?</p> <p>22 A. I wouldn't classify them as 23 suspicions. I had this crazy girl. I didn't 24 know what was true or not. And I wanted to get</p>
<p>Page 337</p> <p>1 MR. CAVALIER: I want the text 2 message that transmitted the recording.</p> <p>3 MR. CARSON: We'll look at it and 4 we'll get back to you.</p> <p>5 I mean, it is the end of discovery 6 though.</p> <p>7 THE DEPONENT: You have the 8 recording.</p> <p>9 MR. CARSON: We'll look and we'll 10 produce -- we can -- I'll represent to 11 you that we'll take a look and we'll 12 produce any communications with Jan Tommy 13 Robinson.</p> <p>14 MR. CAVALIER: That's fair enough. 15 As long as I have your representation on 16 that.</p> <p>17 MR. CARSON: I can look.</p> <p>18 MR. CAVALIER: This is a natural 19 time to take five, Seth.</p> <p>20 Do you mind if I take five?</p> <p>21 MR. CARSON: Yeah, that's good.</p> <p>22 MR. CAVALIER: Off the record.</p> <p>23 THE VIDEOGRAPHER: The time is 24 4:29 p.m. We are off the record.</p>	<p>Page 339</p> <p>1 to the bottom of it.</p> <p>2 Q. All right. But even before she 3 messaged you claiming that Danny Thomas stole 4 money from the Forum, you had some suspicion that 5 something wasn't right, correct?</p> <p>6 MR. CARSON: Objection.</p> <p>7 THE DEPONENT: Well, I did. And I 8 brought that to Greg's attention back in 9 June when we were talking about paying 10 Jan and -- when we were paying Jan and 11 Vinny or whatever. And Greg's like, 12 don't worry about it, just pay them.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. And the Vinny thing that you 15 referred to, he warned you that Danny Thomas 16 might have stolen money back in 2018, correct?</p> <p>17 MR. CARSON: Objection.</p> <p>18 THE DEPONENT: No. He was just 19 saying he wasn't getting paid and that 20 Danny was, like, a loser. And he thinks 21 he's an undercover -- what did he think 22 he was? He thought he was undercover 23 grass, as he called. Like an informant 24 for the FBI or whatever they had going on</p>

<p>1 over there.</p> <p>2 It was very bizarre.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. So your testimony is that Vinny</p> <p>5 did not voice any suspicion to you that Danny</p> <p>6 Thomas might have misappropriated money from that</p> <p>7 grant?</p> <p>8 A. The whole thing with Vinny over</p> <p>9 and over again, which was such insane nonsense,</p> <p>10 that, like, I -- and, you know, he said that he</p> <p>11 got his -- his stuff, like his -- like originally</p> <p>12 from Jasmine, like where he got -- where he got</p> <p>13 that from was Jasmine.</p> <p>14 Because Jasmine was reaching out</p> <p>15 in the beginning to everyone trying to throw</p> <p>16 Danny under the bus.</p> <p>17 So I don't know -- and, like, I</p> <p>18 still didn't.</p> <p>19 And, again, when Vinny wasn't</p> <p>20 trying to warn me, he was telling me what Jaz</p> <p>21 said and he believed him, like I said, to be an</p> <p>22 undercover agent, and you couldn't get a word in</p> <p>23 edgewise.</p> <p>24 Vinny -- if you were to see how he</p>	<p>Page 340</p>	<p>1 more -- less lost trust, like less</p> <p>2 half-assed.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Okay. So then in March of 2019,</p> <p>5 Jasmine comes along and tells you that Danny</p> <p>6 stole 7,000 from Middle East Forum, correct?</p> <p>7 A. And immediately walked it back.</p> <p>8 That is correct.</p> <p>9 Q. When you say walks it back, how?</p> <p>10 A. She said now I don't know -- she</p> <p>11 specifically said in her text message, now I</p> <p>12 don't know. Now his mom's telling me he got</p> <p>13 \$2,000 from them for the car and they didn't want</p> <p>14 me to know.</p> <p>15 So it was, like, she was assuming</p> <p>16 that he got that money from them, when his mother</p> <p>17 just admitted he got \$2,000 from them.</p> <p>18 And it's in that text feed that</p> <p>19 you already have in your possession.</p> <p>20 Q. Did it occur to you that perhaps</p> <p>21 Jasmine recognized that reporting the father of</p> <p>22 her children for theft might have negative</p> <p>23 consequences for her?</p> <p>24 MR. CARSON: Objection. Asking</p>	<p>Page 342</p>
<p>1 was, you would know.</p> <p>2 Q. So you had the Vinny conversation.</p> <p>3 You had, whether we want to call it --</p> <p>4 A. The Vinny conversation stemmed</p> <p>5 from Jasmine. Let's be clear.</p> <p>6 Q. Okay. Fine.</p> <p>7 But prior to March of 2019, you</p> <p>8 had at least some suspicion, or if you want to</p> <p>9 use another word, I'm welcoming you to give it to</p> <p>10 me, that something wasn't right with that grant</p> <p>11 money, vis-a-vis Danny Thomas, correct?</p> <p>12 MR. CARSON: Objection.</p> <p>13 THE DEPONENT: I didn't know if</p> <p>14 anything wasn't right with the grant</p> <p>15 money. I didn't know if -- like, if</p> <p>16 there was something not right with Danny</p> <p>17 as a person or relationship or all that</p> <p>18 stuff.</p> <p>19 And I didn't like the way Danny</p> <p>20 handled some things with the</p> <p>21 demonstration. And that's why I was the</p> <p>22 one that requested that the money go</p> <p>23 through Rahiem Kasam the second time,</p> <p>24 because I thought he would execute it</p>	<p>Page 341</p>	<p>1 what Jasmine might have recognized.</p> <p>2 You can answer if you know who</p> <p>3 Jasmine is.</p> <p>4 THE DEPONENT: My point is this</p> <p>5 that, like, whatever she recognized or</p> <p>6 didn't recognize, didn't matter.</p> <p>7 She was nuts all the time. And</p> <p>8 you couldn't take a thing -- she would</p> <p>9 say one thing and then the next day it</p> <p>10 was something completely different and it</p> <p>11 was non-stop.</p> <p>12 First she would be, like, Lisa,</p> <p>13 you're so right, you're the only person</p> <p>14 that understands.</p> <p>15 Then she would be, like, you're a</p> <p>16 this, you're a that, you're whatever.</p> <p>17 It was non-stop, back and forth.</p> <p>18 Like, you couldn't -- everything that she</p> <p>19 said at one point and another time she</p> <p>20 totally negated the other way.</p> <p>21 It was awful.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. Okay. So you're saying she was</p> <p>24 all over the place?</p>	<p>Page 343</p>



<p>Page 344</p> <p>1 A. Yeah.</p> <p>2 Q. Okay. But given that, didn't you</p> <p>3 think you had an obligation to let your employer</p> <p>4 know that somebody had, at least, made the</p> <p>5 allegation?</p> <p>6 MR. CARSON: Objection. Asked and</p> <p>7 answered.</p> <p>8 THE DEPONENT: No, because I</p> <p>9 didn't believe her.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. Did you investigate it at all?</p> <p>12 MR. CARSON: Objection. Asked and</p> <p>13 answered.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Other than talking about it with</p> <p>16 Jasmine, did you do anything to investigate the</p> <p>17 allegation?</p> <p>18 MR. CARSON: Objection. Asked and</p> <p>19 answered. You can explain again.</p> <p>20 THE DEPONENT: Like I said, I</p> <p>21 asked Tommy if he heard anything about</p> <p>22 it.</p> <p>23 I asked -- I specifically asked</p> <p>24 Tommy if he knew about it or whatever and</p>	<p>Page 346</p> <p>1 getting a salary for that, then that's</p> <p>2 what it included. I don't know.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. If you didn't know, wouldn't it</p> <p>5 have been best just to ask the Forum?</p> <p>6 A. I originally brought up the money</p> <p>7 situation to Greg with the Jan thing. And I</p> <p>8 said, I don't know what Danny did with the</p> <p>9 remaining. He said, he's out. These people are</p> <p>10 saying they've served the \$900. He said, forget</p> <p>11 about it. Don't worry about Danny. Just pay it.</p> <p>12 MR. CAVALIER: Guys, I apologize.</p> <p>13 I need to step off for literally 30</p> <p>14 seconds.</p> <p>15 Can I get 30 seconds off the</p> <p>16 record real quick? I'll be very quick.</p> <p>17 You don't need to go anywhere.</p> <p>18 THE VIDEOGRAPHER: The time is</p> <p>19 4:56 p.m.</p> <p>20 The time is 5:10 p.m.</p> <p>21 Back on the record.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. So we've talked a little bit about</p> <p>24 your involvement with Tommy Robinson. And I just</p>
<p>Page 345</p> <p>1 Tommy said he didn't. He was in prison</p> <p>2 at the time. He didn't hear anything</p> <p>3 retroactively.</p> <p>4 I asked Jasmine again. She walked</p> <p>5 them back.</p> <p>6 I asked a bunch of people. But I</p> <p>7 don't know what else there was physically</p> <p>8 for me to do.</p> <p>9 I requested his bank statements on</p> <p>10 numerous occasions. He denied it to me.</p> <p>11 So there was nothing left for me</p> <p>12 to do. There was no way to prove it.</p> <p>13 There would be no way for MEF to prove</p> <p>14 it.</p> <p>15 And I don't think that it was even</p> <p>16 in the grant money that now that, like,</p> <p>17 you know, we're going back over what the</p> <p>18 grant is, I don't think that there was --</p> <p>19 I don't know what the exact terms of the</p> <p>20 grant agreement were.</p> <p>21 But I don't think that they had a</p> <p>22 specified dollar amount, other than</p> <p>23 getting the demo off successfully, which</p> <p>24 happened. And if that included Danny</p>	<p>Page 347</p> <p>1 want to get a little bit more background from you</p> <p>2 on that.</p> <p>3 So your involvement with his</p> <p>4 campaign started when?</p> <p>5 A. I don't know. March or May.</p> <p>6 Q. Of what year?</p> <p>7 A. 2019. Okay.</p> <p>8 Q. Well, okay.</p> <p>9 And so when was the first time you</p> <p>10 went to England to work on his campaign?</p> <p>11 A. Around that time.</p> <p>12 Q. Okay. Did you work on him -- did</p> <p>13 you work with him on his European Parliament</p> <p>14 campaign?</p> <p>15 A. That's what I'm talking about.</p> <p>16 Q. Okay. Does it make sense if I</p> <p>17 tell you that was sometime in May of 2019?</p> <p>18 A. Yeah, that makes sense.</p> <p>19 Q. So from June 2019 to August of</p> <p>20 2019, do you remember what you were doing for him</p> <p>21 then?</p> <p>22 A. The campaign was over. I don't</p> <p>23 think I was doing anything for him. Let me just</p> <p>24 think.</p>

<p style="text-align: right;">Page 348</p> <p>1 We had -- I don't think there was</p> <p>2 really anything specifically that I was doing for</p> <p>3 him at that time.</p> <p>4 Q. Were you holding yourself out as</p> <p>5 doing communications work for him?</p> <p>6 A. I was doing communication work for</p> <p>7 him, like, you know, like, as a volunteer basis.</p> <p>8 Q. Okay. And was that true during</p> <p>9 the June 2019 to August 2019 time period?</p> <p>10 A. I mean, like, I don't know if I</p> <p>11 ever really necessarily, like, stopped. Like, if</p> <p>12 he needed something, communication-wise right</p> <p>13 now, I would help him.</p> <p>14 Q. Okay.</p> <p>15 A. But he hasn't, because he's</p> <p>16 dealing with his own stuff right now.</p> <p>17 Q. What do you mean by that?</p> <p>18 A. He's got, like, -- he's not, like,</p> <p>19 advocating stuff.</p> <p>20 I think he's just trying to, like,</p> <p>21 you know, make sure his wife and his kids are</p> <p>22 safe.</p> <p>23 Q. Okay. And you had issues with</p> <p>24 Daniel Pipes and instructions to you with respect</p>	<p style="text-align: right;">Page 350</p> <p>1 Q. Okay. Did he ever restrict your</p> <p>2 involvement with Tommy Robinson?</p> <p>3 A. There were times where he did and</p> <p>4 there were times where he didn't.</p> <p>5 He would be like, I'd be loathed</p> <p>6 to tell you politically, like, what to do -- tell</p> <p>7 you what to do on your personal time.</p> <p>8 But, you know, -- and then there</p> <p>9 was another time where he said, I would limit you</p> <p>10 to your political activity without doing it</p> <p>11 without speaking to us. And so I said, okay.</p> <p>12 And then, you know, after that, I</p> <p>13 had talked to him about some political stuff I</p> <p>14 was doing and he said, well, I can't tell you</p> <p>15 what to do with your own time. Please proceed</p> <p>16 with caution.</p> <p>17 So yes and no.</p> <p>18 Q. Do you think that was a reasonable</p> <p>19 position for him to have as the president of the</p> <p>20 Middle East Forum?</p> <p>21 A. It was a confusing one for him --</p> <p>22 for me that I thought that he held, because if</p> <p>23 I'm doing it on my own time, which I clearly was,</p> <p>24 and I was also not getting paid for it, clearly</p>
<p style="text-align: right;">Page 349</p> <p>1 to your work with Tommy Robinson around this</p> <p>2 time, correct?</p> <p>3 A. Yes and no.</p> <p>4 Q. What do you mean by yes and no?</p> <p>5 A. I mean, like, there's -- there</p> <p>6 were times where I would say to him, like, Tommy</p> <p>7 wants political, like, advice or whatever and so</p> <p>8 I did this.</p> <p>9 And he was, like, oh, good. I'm</p> <p>10 glad that -- they need somebody reasonable to</p> <p>11 talk to, I'm glad it was you.</p> <p>12 And then around the time of the</p> <p>13 election, you know, Daniel Pipes was sending me</p> <p>14 messages and telegrams saying, you know, oh, keep</p> <p>15 me abreast of the situation, let me know what's</p> <p>16 going on about this, let me know what's going on</p> <p>17 about that, did you hear about the outcome of the</p> <p>18 election? Do we have news yet?</p> <p>19 So, like, yes and no. So that he</p> <p>20 would say certain things in, like, you know,</p> <p>21 e-mail correspondence and stuff like that. And</p> <p>22 then he would text me, like, asking him to give</p> <p>23 him status updates, because he wanted Tommy to</p> <p>24 have a favorable outcome.</p>	<p style="text-align: right;">Page 351</p> <p>1 was, then it, like, legally was not blurring the</p> <p>2 line between the 501C issue. So I didn't</p> <p>3 understand what his aversion was when he had</p> <p>4 encouraged me before to help Tommy with these</p> <p>5 matters on my own time.</p> <p>6 Q. Did you ever voice that to him?</p> <p>7 A. I did.</p> <p>8 Q. And what was his response?</p> <p>9 A. Again, I get silence from him</p> <p>10 quite a bit.</p> <p>11 Q. Okay. So just to be clear, I</p> <p>12 understand that you were confused by what you're</p> <p>13 calling his vacillating positions, for lack of a</p> <p>14 better word.</p> <p>15 But do you think it's reasonable</p> <p>16 for him as the president of the Middle East Forum</p> <p>17 to have concerns about an employee of the Middle</p> <p>18 East Forum being publicly involved in something</p> <p>19 like the Tommy Robinson campaign?</p> <p>20 A. I do. Because a lot of times in</p> <p>21 the media, things are twisted and manipulated and</p> <p>22 things like that.</p> <p>23 But, yeah, I think -- I think that</p> <p>24 that's a reasonable position.</p>

<p>Page 352</p> <p>1 Q. Okay. So then while you were 2 confused by his position, to be fair, and I 3 understand what you mean when you say that, but 4 while you were confused by his position, did you 5 have any problems with it? 6 A. I mean -- I don't know what that 7 means. 8 I had problem, like, knowing, 9 like, am I, am I not? Whatever. You know, it 10 was more the problem stemmed from confusion. 11 And did I want to continue 12 helping? Yeah. Like the reason the Middle East 13 Forum wanted to help Tommy Robinson in the first 14 place, he is forwarding the objectives that we 15 were working towards. 16 Q. Did you think that Daniel Pipes' 17 position on this issue was in any way unfair to 18 you? 19 A. I think what I do on my personal 20 time is my personal time. I don't remember -- I 21 don't remember if I felt that it was unfair. 22 Q. Okay. Is Tommy Robinson aligned 23 with the Proud Boys? 24 A. I don't think so. I know he did a</p>	<p>Page 354</p> <p>1 Q. Okay. So a couple questions there 2 to just follow-up. 3 You said they were labeled a 4 terrorist organization. Labeled by who? 5 A. I believe the FBI. 6 Q. Do you think they're a terrorist 7 organization? 8 A. Do I think that they are? 9 I mean, I don't know their inner 10 workings of it at all. But the Proud Boys that I 11 have seen in the streets and stuff like that, 12 they're just like regular people that want to, 13 you know, not have ANTIFA burn down their cities. 14 Q. Do you think -- just to build on 15 what you said earlier, just to clarify something 16 for me. 17 Do you think that the Proud 18 Boys -- is it fair to describe the Proud Boys as 19 the right wing equivalent of the left wing 20 ANTIFA? 21 A. I think ANTIFA is way worse. Way 22 worse. 23 Like, the only time the Proud Boys 24 engage in, like, physical activity of any sort is</p>
<p>Page 353</p> <p>1 video. 2 I mean, the thing with the Proud 3 Boys is, like, some of their missions overlap 4 into other things and some parts don't. So, you 5 know, it is what it is. 6 Q. So just for two record, and for my 7 own knowledge, who are the Proud Boys? 8 A. The Proud Boys were originally 9 started by a guy named Gavin McGuinness, who was 10 actually friends with Tommy. 11 And then he made some statements 12 and -- that were like -- like leading -- like, 13 saying, like, you know, we're gonna beat people 14 up and stuff like that. 15 And then he resigned or something 16 like that, Gavin did, and was kicked off, like, 17 whatever. 18 And then they got labeled, like, a 19 terrorists organization or something like that. 20 And then -- and they were -- you 21 know, like, they -- a part of the people -- like 22 the left has ANTIFA and the right has Proud Boys 23 and they clash and fight and all kinds of weird 24 stuff.</p>	<p>Page 355</p> <p>1 when, like -- they'll come to a Trump rally, say, 2 and then ANTIFA comes and starts fighting with 3 them and they may protect people. 4 They do not, like, go out in the 5 street and publicly riot and -- or assault people 6 while they're having dinner just on the streets 7 of Washington, D.C. 8 They do not engage in any violence 9 ever that isn't preempted by ANTIFA. They're 10 more like a protection group. 11 Q. Okay. 12 A. I mean, and there's proof to that. 13 Like, they don't riot. 14 Q. Do you think they have any 15 responsibility for the January 6th events at the 16 Capitol? 17 A. I saw a lot of different groups 18 there. I was there, as I'm sure you know. 19 I saw ANTIFA there. I saw Proud 20 Boys there. I saw people that associate with the 21 Proud Boys there. 22 I see -- I saw all kinds of people 23 at the event at the Capitol. 24 Q. Just -- again, just for the</p>

<p style="text-align: right;">Page 356</p> <p>1 record, were you in the Capitol on January 6th?</p> <p>2 A. I was not in the Capitol. I was</p> <p>3 around the Capitol. I had a woman that I saw. A</p> <p>4 last minute -- not a last minute. She was, like,</p> <p>5 coming down with her husband. They looked like</p> <p>6 they were in their 60s.</p> <p>7 And he been -- clearly had been</p> <p>8 affected by gas or whatever. And so her and I</p> <p>9 were talking. And I said, were you in there?</p> <p>10 Tell me what was happening, because my co-workers</p> <p>11 and things were in the building.</p> <p>12 And so she was explaining it to me</p> <p>13 and she showed me a picture of this woman who</p> <p>14 stole Nancy Pelosi's name placard.</p> <p>15 So I took a picture of her phone</p> <p>16 with my phone. And then she said, oh, you want</p> <p>17 it? She was, like, I've got tons of video, so</p> <p>18 she air dropped it to me, which I forwarded to</p> <p>19 the FBI, along with all the footage I took from</p> <p>20 the perimeter of the building time stamped.</p> <p>21 Like, so the times that she's in</p> <p>22 that building, like, you can hear me on the voice</p> <p>23 on the other side, outside, way further back in</p> <p>24 the crowd filming.</p>	<p style="text-align: right;">Page 358</p> <p>1 mean?</p> <p>2 A. In Cannon House office building.</p> <p>3 Q. Okay. Where is that in relation</p> <p>4 to the Capitol?</p> <p>5 A. Across the street. And also</p> <p>6 connected by tunnels.</p> <p>7 Q. Okay. Does Tommy Robinson's</p> <p>8 connection to the Proud Boys bother you at all?</p> <p>9 A. Like, I don't even think -- he's</p> <p>10 not affiliated by any means. He's not part of</p> <p>11 the Proud Boys.</p> <p>12 Q. Right. But he's friends with the</p> <p>13 guys who lead them, correct?</p> <p>14 A. I don't know if he is friends with</p> <p>15 them.</p> <p>16 Like, they don't hang out on the</p> <p>17 weekends. I'm sure they know each. I believe</p> <p>18 that somebody told me that he just did a video</p> <p>19 with them, like an interview or something.</p> <p>20 But I didn't see it.</p> <p>21 But I don't know what his -- I</p> <p>22 don't discuss the Proud Boys with Tommy ever. I</p> <p>23 don't think I ever have.</p> <p>24 I did ask one of Tommy's contacts</p>
<p style="text-align: right;">Page 357</p> <p>1 So I was not in the Capitol, but I</p> <p>2 do have footage, intense footage, from inside the</p> <p>3 Capitol.</p> <p>4 Q. And so you were -- so you weren't</p> <p>5 inside the building, but you were -- you were</p> <p>6 there?</p> <p>7 A. Correct.</p> <p>8 Q. Okay.</p> <p>9 A. I was trying to get to work</p> <p>10 actually.</p> <p>11 Q. Right. No, I know.</p> <p>12 And just, again, so the record's</p> <p>13 clear, you work in the Capitol building?</p> <p>14 A. Well, I don't work in the Capitol</p> <p>15 building. I work in Cannon House office</p> <p>16 building, which is, you know, like attached to</p> <p>17 the building via underground tunnels and directly</p> <p>18 across the street, but the Cannon was not</p> <p>19 attacked; however, it was shut down, which is why</p> <p>20 I couldn't get in the building.</p> <p>21 Q. Were you there all day?</p> <p>22 A. Pretty much. Even into the</p> <p>23 evening.</p> <p>24 Q. Where do you work? Physically, I</p>	<p style="text-align: right;">Page 359</p> <p>1 for -- for a -- I did ask one of Tommy Robinson's</p> <p>2 contacts for the leader of the Proud Boys'</p> <p>3 information, because a panel that I'm speaking on</p> <p>4 in April wanted to invite Enrique Toro, whatever</p> <p>5 the hell his name is, to be a speaker there.</p> <p>6 They always bring people from the</p> <p>7 right and the left. It's like a four people</p> <p>8 panel discussions. And then they hash out big</p> <p>9 topics of the day from all walks. It's called</p> <p>10 The Better Discourse Event.</p> <p>11 Q. Okay. And who's Enrique Terio?</p> <p>12 A. I think he is the leader of the</p> <p>13 Proud Boys.</p> <p>14 Q. Okay. I want to just show you an</p> <p>15 exhibit here.</p> <p>16 A. I have his phone number.</p> <p>17 Q. Do you know him?</p> <p>18 A. I don't know him. I've never met</p> <p>19 him, no.</p> <p>20 Q. Have you ever spoken to him?</p> <p>21 A. Have I ever spoken to? No, I have</p> <p>22 never spoken to him.</p> <p>23 Q. Okay.</p> <p>24 A. I do have his phone number though.</p>



<p>Page 360</p> <p>1 Q. And I'm showing you -- I think 2 this is Exhibit F, we'll mark it as. 3 A. Yes. Is this the thing he did 4 with him? I heard he did the -- 5 (Deposition Exhibit F marked.) 6 BY MR. CAVALIER: 7 Q. For the record, can you identify 8 the two people pictured here? 9 A. Tommy's on the right and I believe 10 that's Enrique on the left. 11 Q. Okay. And when you say this is 12 the event that you were referring to, it looks 13 like it's something captioned The Right View? 14 A. Yeah, I don't know what that is. 15 Q. Okay. 16 A. Somebody in passing told me, like, 17 Tommy just did an interview or something with 18 Enrique and that's all I know. 19 Q. Okay. Sorry. Give me one second. 20 I have a document. 21 A. While we're doing that, can I just 22 run and grab a glass of water? 23 Q. Of course you can. 24 We can stay on the record as long</p>	<p>Page 362</p> <p>1 A. The only person that I recognize 2 from this picture is up on the top left-hand 3 corner is Danny Tomo and on the bottom left-hand 4 corner is Tommy Rothlinson. 5 And I don't know if that's Enrique 6 at the top middle, but it look it's like the 7 same -- he looks honestly lighter. But it looks 8 like the same window setting from before. 9 So that's it. I don't know 10 anybody else. 11 Q. Okay. You don't know who this is 12 in the middle left with the -- what appears to be 13 the union jacket behind him? 14 A. I didn't really see his face to be 15 fair. It's, like, blurry and looks like a big 16 bald guy. 17 Q. I agree with that description. 18 And you don't know who the guy in 19 the middle is? 20 A. No, he doesn't look familiar. 21 Q. Okay. 22 A. But these are really blurry on my 23 end. I don't know if they're clear on your -- 24 Q. No, it's a screen shot. It's not</p>
<p>Page 361</p> <p>1 as you're quick. 2 A. Yeah, stay on the record. Two 3 seconds. I'm back. I'm sorry. 4 Q. No problem. 5 All right. I'm gonna show you 6 another document here in a second. 7 Sorry. Give me one second. I 8 don't know why this document's not popping up. 9 These Zoom depositions are killing 10 me. 11 A. You're not the only one. 12 (Deposition Exhibit G marked.) 13 BY MR. CAVALIER: 14 Q. Okay. All right. Showing you an 15 exhibit that we will mark as Exhibit G, I 16 believe. 17 This appears to be another screen 18 shot from the same event. 19 A. Okay. 20 Q. Can you take me through -- there 21 are pictures of eight -- what appear to be 22 individuals. 23 Can you walk me through anybody 24 that you can identify in this picture?</p>	<p>Page 363</p> <p>1 great pictures. So I was just -- 2 A. Sorry. 3 Q. No, that's no problem. 4 Do you still manage Tommy 5 Robinson's Telegram account? 6 A. I never managed his Telegram 7 account. 8 Q. Do you manage any of his social 9 media accounts? 10 A. No, he doesn't have any social 11 media accounts other than Telegram. 12 Q. Do you maintain any of his 13 communications platforms? 14 A. No, not anymore. I never really 15 did his communication platforms. 16 I would occasionally answer some 17 press e-mails for him or go through some e-mails, 18 like, looking -- helping him look for stories 19 that would come into, like, the info box. 20 But I never managed his social 21 media like that. 22 Q. Okay. You currently work for 23 Congressman Randy Weber, correct? 24 A. Correct.</p>

<p>Page 364</p> <p>1 Q. Do you handle interviews and press</p> <p>2 for him?</p> <p>3 A. Yes.</p> <p>4 Q. Has that always been the case</p> <p>5 since you started working there?</p> <p>6 A. Yes.</p> <p>7 Q. Just to be clear, you said you</p> <p>8 never met -- I think his name is Enrique Torio?</p> <p>9 A. Correct.</p> <p>10 Q. Have you ever met with any of the</p> <p>11 Proud Boys?</p> <p>12 A. I met a bunch of them one of the</p> <p>13 nights that I was out filming with one of my</p> <p>14 friends who's a contributor for Newsmax.</p> <p>15 There was a ton out. It's the</p> <p>16 night that one of the Proud Boys got stabbed by</p> <p>17 ANTIFA in Washington, D.C. I met like a ton of</p> <p>18 them.</p> <p>19 Q. Do you remember what night --</p> <p>20 A. I don't remember their names, but</p> <p>21 I met them.</p> <p>22 Q. Do you remember what night that</p> <p>23 was?</p> <p>24 A. I don't know. Maybe three weeks</p>	<p>Page 366</p> <p>1 A. I think that they're political in</p> <p>2 some right, but I don't know how.</p> <p>3 Q. Okay. Do you know of a group that</p> <p>4 goes by the name the Boogaloo Boys?</p> <p>5 A. I've heard of the Boogaloo Boys.</p> <p>6 I just actually watched a video on them a couple</p> <p>7 weeks ago, which I thought was interesting. I</p> <p>8 think they were at some capitol in Ohio. They</p> <p>9 were having an armed protest.</p> <p>10 And there was -- like one of the</p> <p>11 Boogaloo Boys had like a Black Lives Matters</p> <p>12 shirt on and the other one had like the gay pride</p> <p>13 flag in there.</p> <p>14 And they were sitting there</p> <p>15 talking about how they're there just to prevent</p> <p>16 government overreach or something like that.</p> <p>17 But I don't know much about them</p> <p>18 because I don't know much about them. They're</p> <p>19 not in the news as frequently as, say, the Proud</p> <p>20 Boys or ANTIFA.</p> <p>21 Q. Have you ever met any of them?</p> <p>22 A. I don't think so, no.</p> <p>23 Q. Okay. I want to ask you about</p> <p>24 something that you said earlier.</p>
<p>Page 365</p> <p>1 before December 20th or something. It was like</p> <p>2 the -- the second --</p> <p>3 MR. CARSON: Don't guess. If you</p> <p>4 don't know, just say I don't know.</p> <p>5 THE DEPONENT: I'm just trying to</p> <p>6 give a time frame. It's like around</p> <p>7 then.</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. Okay. Does Tommy Robinson --</p> <p>10 scratch that.</p> <p>11 Does Danny Thomas still work with</p> <p>12 Tommy Robinson?</p> <p>13 A. I have no idea.</p> <p>14 Q. Do you have any reason to believe</p> <p>15 that he might not?</p> <p>16 A. I mean, weren't they just on a</p> <p>17 video together you just showed me? I don't know.</p> <p>18 Q. Okay. I'm asking you.</p> <p>19 Are you familiar with the group</p> <p>20 that goes by the name The Oath Keepers?</p> <p>21 A. I mean, I heard it loosely thrown</p> <p>22 around. I don't know anything about them.</p> <p>23 Q. Do you know who they are or what</p> <p>24 they do?</p>	<p>Page 367</p> <p>1 When you were outside the Capitol</p> <p>2 and you were observing what was going on, I think</p> <p>3 you said there were members of the Proud Boys</p> <p>4 there. There were members of the ANTIFA there.</p> <p>5 There were a lot of people there.</p> <p>6 Who do you think is responsible</p> <p>7 for the events of January 6th?</p> <p>8 MR. CARSON: Why are we asking</p> <p>9 these questions? What's going on right</p> <p>10 now?</p> <p>11 MR. CAVALIER: Because I'm</p> <p>12 curious.</p> <p>13 MR. CARSON: You're just curious</p> <p>14 about her political views?</p> <p>15 MR. CAVALIER: Yeah.</p> <p>16 THE DEPONENT: I have an answer,</p> <p>17 if you want?</p> <p>18 MR. CARSON: Yeah, you can answer</p> <p>19 but I'm gonna cut this line of</p> <p>20 questioning --</p> <p>21 THE DEPONENT: It's not like I</p> <p>22 haven't put most of these views out in</p> <p>23 public anyway.</p> <p>24 MR. CARSON: I would suggest this</p>

<p>1 is not idle curiosity.</p> <p>2 THE DEPONENT: I understand that.</p> <p>3 But this is how I feel about the whole</p> <p>4 situation.</p> <p>5 I think that Donald Trump turned</p> <p>6 up the rhetoric. I do.</p> <p>7 Do you think I think that his</p> <p>8 speech -- his speech rises to the level</p> <p>9 of incitement from everything that I've</p> <p>10 studied and read? No.</p> <p>11 Do I think that the individual</p> <p>12 people who made poor decisions to enter</p> <p>13 the Capitol should be -- not to enter the</p> <p>14 Capitol, to break and to bust into the</p> <p>15 Capitol were actually wrong and I can a</p> <p>16 110 percent condemn the violence. And</p> <p>17 those people made their own decisions.</p> <p>18 It was apparently pre-planned</p> <p>19 according to news reports and Facebook</p> <p>20 and the FBI.</p> <p>21 And that then they had their own</p> <p>22 motives. And I don't know if those</p> <p>23 people were disenfranchised, like, you</p> <p>24 know, Trump voters or if it was ANTIFA.</p>	<p>Page 368</p> <p>1 recently that she said that the Capitol</p> <p>2 insurrection was planned by ANTIFA.</p> <p>3 Do you agree with that statement?</p> <p>4 A. I don't -- I don't. Because I</p> <p>5 don't have any information.</p> <p>6 I don't know who it was planned</p> <p>7 by, because I don't have -- I'm not privy to that</p> <p>8 information. So I certainly don't make</p> <p>9 statements like that.</p> <p>10 I said ANTIFA was there. I also</p> <p>11 saw legit Trump supports there, too. And I saw</p> <p>12 them engaging in violence.</p> <p>13 So I can't say that it was solely</p> <p>14 ANTIFA. I don't know who planned it. I do know</p> <p>15 that John Sullivan, who I've seen out at multiple</p> <p>16 riots and things like that, has his own, from his</p> <p>17 own video testimony, telling a female journalist</p> <p>18 that he was with, I told you it was going to</p> <p>19 happen. I told you I couldn't tell you much.</p> <p>20 But I told you this was going to happen.</p> <p>21 And he is straight up -- he has</p> <p>22 made speeches at ANTIFA protests -- I mean, at</p> <p>23 Black Lives Matter and ANTIFA protests where he</p> <p>24 was asked to speak as an organizer.</p> <p>Page 370</p>
<p>1 But I will tell you that I did see</p> <p>2 ANTIFA things, like black umbrellas and</p> <p>3 stuff.</p> <p>4 And from what I've known about</p> <p>5 these groups and whatever, that nobody</p> <p>6 ahead of time that is a Trump supporter</p> <p>7 would have blown up -- put a bomb out in</p> <p>8 front of the RNC.</p> <p>9 The only people that would have</p> <p>10 put both a pipe bomb in front of the RNC</p> <p>11 and DNC is most likely an anarchist.</p> <p>12 So I don't know who is exactly</p> <p>13 responsible. I think that everybody</p> <p>14 should be held accountable for their</p> <p>15 behavior the day of the Capitol.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. We talked a little bit about Amy</p> <p>18 Meckleberg in your last deposition. So we don't</p> <p>19 have to rehash all of that background.</p> <p>20 But I wanted to ask you what your</p> <p>21 relationship with Amy Meckleberg is like today?</p> <p>22 A. She's my friend. My very good</p> <p>23 friend.</p> <p>24 Q. So part of my curiosity, I read</p>	<p>Page 369</p> <p>1 Q. Okay.</p> <p>2 A. But I like I said, there were</p> <p>3 definitely Trump people involved.</p> <p>4 It's kind of --it kind of felt</p> <p>5 like mob mentality took over.</p> <p>6 Like one person decided they were</p> <p>7 going to do it and everybody was, like, oh, this</p> <p>8 might be a good idea.</p> <p>9 And by the time a lot of people</p> <p>10 even got to the doors, the Capitol Police had</p> <p>11 just said, all right, we're not going to fight</p> <p>12 them, we don't have enough people to arrest them.</p> <p>13 Because once you arrest, you have to arrest them.</p> <p>14 So they couldn't do that.</p> <p>15 And they were basically outmanned.</p> <p>16 And so they were -- at one point they were just</p> <p>17 opening the doors and being nice to the people so</p> <p>18 that they didn't get hurt.</p> <p>19 So I think that a lot of people</p> <p>20 that came secondary, in the secondary wave, after</p> <p>21 Trump -- because the insurrection started</p> <p>22 happening -- like the breaching of the Capitol</p> <p>23 started happening before Donald Trump ever</p> <p>24 finished speaking.</p> <p>Page 371</p>

<p>Page 372</p> <p>1 And so the people that marched 2 from where he was speaking, it would at least 3 take 20 to 30 minutes to get from the Elipse to 4 the Capitol -- and so those people, the doors 5 would have already been broken and already been 6 breached and already opened. 7 So I think that a lot of them -- 8 like you see that poor little old granny, she 9 was -- was like, I've never been in the Capitol 10 before. 11 You see pictures -- they're taking 12 pictures, like, I've never been in this place 13 before. 14 And I think that, you know, they 15 weren't of sound mind. It was more of like a mob 16 mentality thing. 17 I don't think that everybody who 18 crossed the line -- that walked into that Capitol 19 was, you know, part of some pre-planned or 20 thought that they were, you know, inciting -- or 21 were being insurrectionists. 22 Q. Okay. So the question was, do you 23 agree with the statement that Meckleberg made and 24 I'm going to take that answer to mean that you</p>	<p>Page 374</p> <p>1 She was crying. And then she was 2 like I'm -- she was, like, I just want to jump on 3 a plane right now and I want to come to America. 4 And I was like, well, when the COVID stuff comes, 5 you can come visit, no problem, blah, blah, blah. 6 And so then I remember, like right 7 after then, Danny had texted me something crazy. 8 And I said, here, Jaz, just so you know, I think 9 this is from Danny. He texted me. I don't want 10 to anything -- to have anything to do with him. 11 I'm just letting you know that he texted me 12 again. 13 And she goes, oh, Danny's the 14 least of your worries. Wait until you see what 15 Greg Roman has in store for you. 16 And then I never talked to her 17 again. 18 Q. Okay. So prior to the last time 19 you spoke with Jasmine Bishop, Jasmine spoke with 20 MEF and provided documents to them, right? 21 A. I did not -- I did not know any of 22 that at any time that I was speaking to Jaz. 23 Q. Did you know that she had spoken 24 to Greg at any point in time when you were</p>
<p>Page 373</p> <p>1 don't agree with it. 2 A. Yeah, I probably don't agree with 3 that, no. 4 Q. Okay. When was the last time you 5 spoke to Danny Thomas? And by spoke, just so 6 we're clear, by phone or by text? 7 A. It feels like a year maybe. Maybe 8 more. 9 Q. When was the last time you spoke 10 with Jasmine Bishop? 11 A. Has to be well over six to eight 12 months, I believe. Something like that. Like 13 it's been a long time. Maybe more -- maybe more 14 than that. I don't know. 15 Q. Do you remember what you talked 16 about the last time you spoke? 17 A. I was helping her -- I remembered 18 that her mother -- she was calling me -- I was at 19 home in Philly and she was calling me crying 20 because her mother was doing really bad. She, 21 like, relapsed or something bad happened to her. 22 And Jaz had left Danny and the 23 kids. And she was crying and saying that he went 24 back to some other girl. I don't remember.</p>	<p>Page 375</p> <p>1 speaking to? 2 A. I did not. I didn't find that out 3 until deposition. 4 Actually, I didn't even know she 5 actually did speak with you until just this 6 second. 7 But I knew that from the 8 deposition that -- that Danny did. 9 Q. So Jasmine Bishop never told you 10 that she spoke with Greg? 11 A. I think she said I've been in 12 contact with them and wait until you see what he 13 has in store for you. But I didn't know what 14 that meant. 15 Q. Right. But you learned that from 16 Jasmine, right? Not at the deposition? 17 A. Yeah. But you just said, like, 18 she provided documents and was whatever, whatever 19 the words you used. And I did not know that 20 until basically like now. 21 Q. Okay. But you knew she had spoken 22 to MEF? 23 A. Yeah. But she had -- again, she's 24 also said that she spoken to them a million times</p>



<p>Page 376</p> <p>1 before when she hadn't. And she also takes back</p> <p>2 her story all the time, so -- she told me she</p> <p>3 spoke to Greg and -- Greg and Daniel like two</p> <p>4 years ago, too. And she didn't.</p> <p>5 Q. So did you ask her why she would</p> <p>6 talk to Greg?</p> <p>7 A. No, I just figured, if anybody is</p> <p>8 talking to Greg, they are up to trouble and I'm</p> <p>9 not going to talk to them anymore.</p> <p>10 Anybody who has a connection with</p> <p>11 Greg, I don't want to deal with.</p> <p>12 Q. When did you arrive at that</p> <p>13 conclusion?</p> <p>14 A. What do you mean?</p> <p>15 Q. When did you decide that anybody</p> <p>16 who had a connection with Greg was somebody that</p> <p>17 you didn't want to talk to?</p> <p>18 A. Pretty much when I left the Middle</p> <p>19 East Forum.</p> <p>20 Q. Do you know someone named Calan</p> <p>21 Robinson?</p> <p>22 A. I met Calen -- I knew two Calens.</p> <p>23 I don't know if the other -- I don't know his</p> <p>24 last name.</p>	<p>Page 378</p> <p>1 were supposed to be advocating on his behalf.</p> <p>2 And then Tommy was under the impression, or</p> <p>3 something like that, that they were taking those</p> <p>4 donation monies and using them for their own</p> <p>5 benefit.</p> <p>6 I think there's proof of that, but</p> <p>7 I'm not a hundred percent sure.</p> <p>8 Q. And can you put a time frame on</p> <p>9 that at all?</p> <p>10 A. Juneish, I guess. June of 2018.</p> <p>11 Or no, probably before that, because Tommy was</p> <p>12 arrested before then.</p> <p>13 MR. CARSON: If you can't, you</p> <p>14 can't. If you don't know, you don't</p> <p>15 know. If you know, then tell him.</p> <p>16 MR. CAVALIER: Yeah, I'm not</p> <p>17 looking for an exact date.</p> <p>18 THE DEPONENT: It was when Tommy</p> <p>19 Robinson was in prison for journalism.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Okay. Are you aware that Calan</p> <p>22 Robinson reached out to the Middle East Forum</p> <p>23 about this case?</p> <p>24 A. He doesn't even know me.</p>
<p>Page 377</p> <p>1 But the one that I think that</p> <p>2 you're referring to, Calan Robinson, was the one</p> <p>3 that used to work for Tommy Robinson. I met him</p> <p>4 one time at a dinner in Brussels.</p> <p>5 Q. What did he do for Tommy?</p> <p>6 A. He did video, I believe. Or</p> <p>7 production or something.</p> <p>8 Because he didn't work with Tommy</p> <p>9 at the time I did, because there were some lofty</p> <p>10 things that were said about him or -- that Tommy</p> <p>11 knew that he did or something like that. And</p> <p>12 they stopped working together while -- like</p> <p>13 before -- well, while Tommy was in jail.</p> <p>14 And when Tommy was released, they</p> <p>15 did not -- they didn't work together again from</p> <p>16 what I was told.</p> <p>17 Q. So I'm not sure I understood you</p> <p>18 there.</p> <p>19 Why didn't they work together</p> <p>20 again?</p> <p>21 A. Apparently there was -- there was,</p> <p>22 like, rumors around, like, they had access to</p> <p>23 Tommy's donation accounts.</p> <p>24 And while he was in prison, they</p>	<p>Page 379</p> <p>1 Q. Is that a no?</p> <p>2 A. Yeah, no, I was not aware.</p> <p>3 MR. CARSON: How would we be aware</p> <p>4 of that?</p> <p>5 THE DEPONENT: I met Calen one</p> <p>6 time. You know that Calen has, like, a</p> <p>7 vendetta against Tommy, too, right?</p> <p>8 BY MR. CAVALIER:</p> <p>9 Q. What do you mean by that?</p> <p>10 A. Calan and George -- there was like</p> <p>11 this whole thing with the BBC panorama and Calan</p> <p>12 and George had disclosed things to Tommy.</p> <p>13 And then were getting, like,</p> <p>14 threatened by, like, Hope Not Hate, or something</p> <p>15 like that, this organization in England.</p> <p>16 And Tommy put their statements --</p> <p>17 and they agreed to it. They put their statements</p> <p>18 in a documentary. And then I guess they got</p> <p>19 backlash or whatever for it afterwards.</p> <p>20 And they have not -- I don't think</p> <p>21 they've mended their relationship since then. So</p> <p>22 there's a big, long -- there's all kinds of</p> <p>23 information if you want to look that up.</p> <p>24 Lawrence Southern wrote a whole piece on it or</p>

<p style="text-align: right;">Page 380</p> <p>1 something.</p> <p>2 Q. Do a lot of people have vendettas</p> <p>3 against Tommy Robinson?</p> <p>4 A. I'm sure.</p> <p>5 There's a lot of people that have</p> <p>6 vendettas against congressmen. When you're a</p> <p>7 public person, absolutely.</p> <p>8 Q. You just mentioned a George in</p> <p>9 your answer to my last question.</p> <p>10 A. No, I didn't. I said I'm sure.</p> <p>11 Q. No, I mean -- in the question that</p> <p>12 I asked you before that.</p> <p>13 A. Oh, Calan and George were a team.</p> <p>14 Q. Right. So all I want to know is</p> <p>15 George who?</p> <p>16 A. I don't know -- do I know his last</p> <p>17 name? Calan and George. I just know it was</p> <p>18 Calen and George.</p> <p>19 Q. George Egler?</p> <p>20 A. No.</p> <p>21 Q. Different George?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay.</p> <p>24 A. George Egler is like old. The</p>	<p style="text-align: right;">Page 382</p> <p>1 of money for doing that.</p> <p>2 Q. What's nominal?</p> <p>3 A. I get \$500 a month.</p> <p>4 Q. Okay. And how much time do you</p> <p>5 spend in a given month doing that?</p> <p>6 A. Some months I spend a lot of time.</p> <p>7 Some months I spend less.</p> <p>8 But I definitely spend a good</p> <p>9 amount of time doing it.</p> <p>10 Q. Okay. So can you give me just a</p> <p>11 brief description of what your job is in managing</p> <p>12 the social media? What do you do?</p> <p>13 A. It's not just social media.</p> <p>14 There's all kinds of stuff. So, like, the budget</p> <p>15 for, you know, should we spend more on digital</p> <p>16 advertising? The strategy behind it. Managing</p> <p>17 the Facebook comments that come in. Managing the</p> <p>18 campaign e-mail. Managing the, you know,</p> <p>19 interaction between the chief of staff and the</p> <p>20 vendors and the fundraising team and coordinating</p> <p>21 of that kind of stuff.</p> <p>22 It's a very complicated thing.</p> <p>23 Especially in an election year.</p> <p>24 Q. You manage the congressman's</p>
<p style="text-align: right;">Page 381</p> <p>1 other George is, like, real young.</p> <p>2 Q. Just to back up real quickly.</p> <p>3 Do you -- so you're Director of</p> <p>4 Communications for Congressman Randy Weber right</p> <p>5 now, correct?</p> <p>6 A. Yeah.</p> <p>7 Q. Do you also manage his campaign</p> <p>8 social media fundraising?</p> <p>9 A. Not his fundraising. But his</p> <p>10 campaign social media and some of the messaging.</p> <p>11 Not all of it.</p> <p>12 Q. Okay. Are you paid separately for</p> <p>13 that?</p> <p>14 A. I am.</p> <p>15 Q. Okay. And so that's not part of</p> <p>16 your core job as Director of Communications?</p> <p>17 A. I mean, it's part of my job.</p> <p>18 Q. Okay.</p> <p>19 A. Because of the way I have to do</p> <p>20 campaign work on my own time, and you can hire a</p> <p>21 certain amount of people to work on the campaign,</p> <p>22 like, that are actual staff members, as long as</p> <p>23 they do their work on their own time. And I get</p> <p>24 a nominal portion -- like a get a nominal amount</p>	<p style="text-align: right;">Page 383</p> <p>1 social media accounts?</p> <p>2 A. Yes. Like I'm responsible for</p> <p>3 hiring the company that puts out small -- well, I</p> <p>4 put out some content and then we hired a company</p> <p>5 that puts out some content.</p> <p>6 Q. Well, so just -- again, by way of</p> <p>7 example, like if I'm on Twitter tonight and see a</p> <p>8 Tweet from Congressmen Weber, is that something</p> <p>9 you would have written or posted?</p> <p>10 A. So there are some tweets that I</p> <p>11 post for him. But, like, largely he posts his</p> <p>12 own social media all the time.</p> <p>13 He actually had an accidental post</p> <p>14 the other night that I deleted for him, but he</p> <p>15 wrote it.</p> <p>16 Q. Okay. Okay. So I think you said</p> <p>17 you do manage it, but you're not the sole person</p> <p>18 who operates it?</p> <p>19 A. No. Like -- I pretty much am the</p> <p>20 sole person who operates his Facebook and his</p> <p>21 Instagram. But his Twitter, he tweets on his own</p> <p>22 often and retweets on his own often. More than</p> <p>23 I'd like him to.</p> <p>24 Q. Okay. Who's Danny Barker?</p>

<p>Page 384</p> <p>1 A. Barker. He was a long-time friend 2 of Tommy Robinson and did security work for him 3 off and on for the last, like, I guess, 10 years, 4 I guess. Maybe longer, maybe shorter. Something 5 like that.</p> <p>6 Q. Okay. Did you have a relationship 7 with him?</p> <p>8 A. Not a sexual one. A friendship.</p> <p>9 Q. Okay. When did that friendship 10 begin?</p> <p>11 A. When we started working on the 12 campaign.</p> <p>13 Q. So that would have been early 14 2019?</p> <p>15 A. Uh-huh. May, I think you said.</p> <p>16 Q. Okay. I want you to look at a 17 document here real quick. Just give me a second 18 to pull it up.</p> <p>19 All right. So this is a What's 20 App message chain.</p> <p>21 A. For Barker.</p> <p>22 Q. For Barker?</p> <p>23 A. Yeah.</p> <p>24 Q. Do you recognize this phone</p>	<p>Page 386</p> <p>1 produced in McNulty, which has nothing to 2 do with the AEO designation.</p> <p>3 I'm gonna offer this to you again, 4 do you want to go off the record to 5 discuss this?</p> <p>6 MR. CARSON: Yeah, I think we 7 should seal this part of the --</p> <p>8 MR. CAVALIER: We can seal them, 9 too, if you'd like.</p> <p>10 MR. CARSON: There's nothing here 11 to discuss.</p> <p>12 MR. CAVALIER: Is that the easiest 13 way to do it, Seth, do you want to seal 14 it?</p> <p>15 There's nothing in here that's 16 going to be incredibly sensitive that I 17 think you're concerned about.</p> <p>18 MR. CARSON: Okay.</p> <p>19 MR. CAVALIER: Well, we can seal 20 it if you'd like. I have no problem with 21 that.</p> <p>22 MR. CARSON: Yeah, I think we 23 should treat the deposition transcript as 24 a confidential document.</p>
<p>Page 385</p> <p>1 number?</p> <p>2 A. I don't recognize anybody's phone 3 number.</p> <p>4 Q. Okay.</p> <p>5 MR. CARSON: Aren't these messages 6 supposed to be attorney's eyes only?</p> <p>7 MR. CAVALIER: No.</p> <p>8 MR. CARSON: Yeah, they are. I 9 mean --</p> <p>10 MR. CAVALIER: Do you want to go 11 off the record and discuss that?</p> <p>12 MR. CARSON: I mean, we didn't 13 discuss any of this stuff, so --</p> <p>14 MR. CAVALIER: Pardon me? I 15 couldn't hear you.</p> <p>16 MR. CARSON: There was no 17 discussion about removing that 18 designation from any of these, not one. 19 Not any of the ones we saw today.</p> <p>20 MR. CAVALIER: I don't -- first of 21 all, there's so many issues with that 22 objection, I'm not even really sure where 23 to start.</p> <p>24 Some of the stuff we looked at was</p>	<p>Page 387</p> <p>1 MR. CAVALIER: Why don't we do 2 that and then you and I can have a 3 conversation after the fact, if there's 4 anything you're worried about within in 5 it, we can deal with it that way.</p> <p>6 MR. CARSON: Okay.</p> <p>7 MR. CAVALIER: Is that fair?</p> <p>8 THE DEPONENT: I'm sorry I'm 9 sitting like this. My head and my neck 10 are just killing me.</p> <p>11 MR. CAVALIER: That's okay. I'm 12 just going to note for the record here, 13 too, this was a document that was 14 produced prior to the AEO order that came 15 out of Wolf's.</p> <p>16 That's why I'm saying, like, 17 there's a lot of different documents we 18 looked at here today and I just wanted to 19 note for the record what they are.</p> <p>20 THE DEPONENT: I don't even know 21 an AEO order is.</p> <p>22 BY MR. CAVALIER: 23 Q. There's some documents that have 24 been produced in this case that are AEO,</p>

<p style="text-align: right;">Page 388</p> <p>1 attorney's eyes only --</p> <p>2 A. Okay.</p> <p>3 Q. -- meaning that unless and until</p> <p>4 they're some kind of discussion or waiver, they</p> <p>5 can only be shared with outside counsel.</p> <p>6 This document was produced before</p> <p>7 that order, but again, I think once we get into</p> <p>8 it, you'll see there's not the issue that your</p> <p>9 counsel's worried about anyway.</p> <p>10 But we can take that when it</p> <p>11 comes.</p> <p>12 Okay?</p> <p>13 First thing I want to ask, can you</p> <p>14 see this document okay? Can you read it?</p> <p>15 A. Yeah, for the most part.</p> <p>16 Q. Okay. I'll pop it up one more.</p> <p>17 So I want to ask you about this</p> <p>18 here on May 9th, 2019.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Danny Barker asks you, I'm in</p> <p>21 agony, do you got any good pain killers? Your</p> <p>22 answer is, I do. I have narcotics. Ha, ha, what</p> <p>23 do you got?</p> <p>24 A. I always have that. Yep.</p>	<p style="text-align: right;">Page 390</p> <p>1 A. We just -- Danny was somebody I</p> <p>2 got along with really, really well. We never had</p> <p>3 an intimate relationship. I never kissed him. I</p> <p>4 missed him so much. I love him like a brother.</p> <p>5 I have a friend here, James, who I</p> <p>6 hang out with all the time, too. I always joke</p> <p>7 around, he's my boyfriend. But he's not. Like,</p> <p>8 I've never had sex or kissed him either.</p> <p>9 But Danny and I are really close</p> <p>10 and we were really, really fond of each other.</p> <p>11 But we were never romantically interested. This</p> <p>12 is just us being goof and fun.</p> <p>13 He's a sweet guy. I feel bad for</p> <p>14 him.</p> <p>15 Q. Why do you feel bad for him?</p> <p>16 A. It's just a hard life. Like a lot</p> <p>17 of the guys over there do. They live paycheck to</p> <p>18 paycheck. And they struggle. And they're always</p> <p>19 just trying to do the right thing. And sometimes</p> <p>20 life knocks them down. And Danny is one of them.</p> <p>21 He is a sweet, sweet guy.</p> <p>22 Q. Okay. So here we have you telling</p> <p>23 Danny Barker that you love him for being there</p> <p>24 for you and you're acknowledging you're being</p>
<p style="text-align: right;">Page 389</p> <p>1 Q. I'm sorry, you said what?</p> <p>2 A. Yep. I have, like -- because of</p> <p>3 my kidney problems and stuff like that, I have</p> <p>4 like Toradol on hand all the time.</p> <p>5 Q. Okay. Why was -- why were you</p> <p>6 telling Danny Barker that?</p> <p>7 A. He asked me. I'm in agony. I</p> <p>8 don't remember how he got hurt. Maybe something</p> <p>9 happened to him, but like, whatever.</p> <p>10 Q. Did you give him some of the meds?</p> <p>11 A. I don't even know if I was there</p> <p>12 then. I probably was, but I probably didn't</p> <p>13 though.</p> <p>14 Q. But you don't remember?</p> <p>15 A. No. But if he was, like, legit</p> <p>16 hurt or something, I mean, I wouldn't be opposed</p> <p>17 to giving him a Toradol, if he didn't feel good.</p> <p>18 Q. Okay. There's a lot of references</p> <p>19 in this document to husband and wife.</p> <p>20 A. Yes.</p> <p>21 Q. I'm assuming that that's</p> <p>22 colloquial. But I wanted to ask you what that</p> <p>23 meant and why you guys referred to each other</p> <p>24 that way.</p>	<p style="text-align: right;">Page 391</p> <p>1 sappy but you're happy that he's in your life.</p> <p>2 A. Uh-huh.</p> <p>3 Q. He writes back and says, I'll</p> <p>4 always be there for you. I wish I could have</p> <p>5 told you when you were over there.</p> <p>6 A. Uh-huh.</p> <p>7 Q. You write back to him, I was just</p> <p>8 telling my girl what an amazing person you are.</p> <p>9 I really wish I lived there.</p> <p>10 A. Uh-huh.</p> <p>11 Q. What do you mean by that?</p> <p>12 A. Just had such a good, like, -- the</p> <p>13 people that I met over there, you know, while --</p> <p>14 even though that they were, like, you know --</p> <p>15 even though they were, like, sometimes rough and</p> <p>16 tumble like that, like deep down they had these</p> <p>17 really amazing hearts.</p> <p>18 And to me, like, you know,</p> <p>19 sometimes I wish I grew up knowing people that</p> <p>20 had that genuineness about them.</p> <p>21 There's part of me that, like, you</p> <p>22 know, wished in, like, some other life I lived</p> <p>23 there. And, like, I grew up and my kids had</p> <p>24 little British accents. It would have been</p>



<p>1 adorable, you know.</p> <p>2 Q. Okay.</p> <p>3 A. I still wish my kids had little</p> <p>4 British accents. Like that Santa Claus kid.</p> <p>5 I can't even do a good British</p> <p>6 accent. I would never survive.</p> <p>7 Q. Just going to the right page here.</p> <p>8 MR. CARSON: This is why we never</p> <p>9 get done.</p> <p>10 THE DEPONENT: What do we got</p> <p>11 left? Like a half an hour?</p> <p>12 MR. CAVALIER: I was just going to</p> <p>13 ask the reporter that in a second.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Okay. Same document.</p> <p>16 A. Uh-huh.</p> <p>17 Q. You're talking with Danny.</p> <p>18 Here you say, he asks how are you</p> <p>19 feeling today.</p> <p>20 You say, a little. Just think I</p> <p>21 don't give a fuck. And he says, about what? You</p> <p>22 say, work. I want to quit.</p> <p>23 A. Uh-huh.</p> <p>24 Q. And Danny says, come there. You</p>	<p>Page 392</p> <p>1 And we went back and forth. And I</p> <p>2 couple -- I wrote a draft of a proposal and then</p> <p>3 another one and then another one.</p> <p>4 I think that Daniel even liked it.</p> <p>5 And for a minute they were considering it. And I</p> <p>6 was like if I got -- if they let me run it, that</p> <p>7 would be awesome. Because I could go back and</p> <p>8 forth, be with the cool people and bring my kids.</p> <p>9 Maybe have my kids go over to England and start</p> <p>10 from a little voice learning how to have that</p> <p>11 little British accent.</p> <p>12 Q. Was the fact that MEF was</p> <p>13 opening -- was considering opening up a London</p> <p>14 office a confidential issue for them?</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Who else did you share the notion</p> <p>17 that MEF was considering opening up a London</p> <p>18 office with?</p> <p>19 A. I think I asked -- because Amy</p> <p>20 knows all those people in the box party that they</p> <p>21 wanted -- I think I asked a bunch of people,</p> <p>22 because Daniel was asking me to identify in each</p> <p>23 state -- he had like these four, like, the</p> <p>24 Bezigrad states or whatever -- maybe it was more</p>
<p>Page 393</p> <p>1 say, I hate my boss. He is a bad person. We may</p> <p>2 be opening an office in London.</p> <p>3 I pray they give it to me to run.</p> <p>4 If I didn't have the kids, I would have quit and</p> <p>5 stayed and found a job there.</p> <p>6 A. All true.</p> <p>7 Q. Okay. Tell me about this</p> <p>8 statement you may be opening an office in London.</p> <p>9 A. So Greg -- not Greg. Was it</p> <p>10 Daniel? Greg. One of them. I forget who it</p> <p>11 was.</p> <p>12 But they were talking about</p> <p>13 expanding operations to London, to Europe, in</p> <p>14 general. And we were talking about a proposal to</p> <p>15 expand MEF and -- to expand MEF and they asked me</p> <p>16 to -- to write it up.</p> <p>17 And I think, like, I asked input</p> <p>18 from Sam. I asked input from people, like, who</p> <p>19 the big players were. There was, like, that back</p> <p>20 and forth, a bunch of e-mails about, like, they</p> <p>21 wanted me to, like, organize what companies we'd</p> <p>22 talk to, would we do it from a grassroots</p> <p>23 approach? Would we do a top-down approach, where</p> <p>24 we would work with, like, government officials?</p>	<p>Page 395</p> <p>1 than that.</p> <p>2 And he asked me to identify the</p> <p>3 key players in the party and then to get their</p> <p>4 contact information. And a lot of that</p> <p>5 information is hard to get.</p> <p>6 I mean, you're talking about the</p> <p>7 leader, like Sallavanti in Italy. Like, it's not</p> <p>8 easy to get his phone number. But Amy has that</p> <p>9 kind of contacts. She always did.</p> <p>10 So I definitely asked her for</p> <p>11 help. I asked Sam for help. Westshop who works</p> <p>12 with MEF.</p> <p>13 I think I asked Janice Atkinson</p> <p>14 for a couple contacts. I mean, I asked a bunch</p> <p>15 of people for contacts, because that's what they</p> <p>16 wanted me to do.</p> <p>17 Q. Did you share internal MEF</p> <p>18 documents with those people?</p> <p>19 A. I don't think so.</p> <p>20 Q. Did you share a document titled</p> <p>21 MEF Europe with Amy Meckleberg?</p> <p>22 A. Yeah. I think I was asking her</p> <p>23 for input.</p> <p>24 I mean, that's my draft of what</p>

<p>Page 396</p> <p>1 I'm gonna submit. Asking her if she thinks it's</p> <p>2 a good idea, since she works with those parties</p> <p>3 all the time.</p> <p>4 It's not an internal document.</p> <p>5 It's my draft.</p> <p>6 Q. Did you ever, at this point in</p> <p>7 time or any other, consider taking a job working</p> <p>8 for a PR consultancy firm?</p> <p>9 A. I had an interview. And then I</p> <p>10 found out that they work with Mohammed Bin Salman</p> <p>11 and they wanted me to based in DuBai, even though</p> <p>12 they had an office in America and London.</p> <p>13 And that wasn't of interest to me.</p> <p>14 And then when I talked to -- when I had an</p> <p>15 introductory interview, I basically let the woman</p> <p>16 know that on the phone and then we stopped</p> <p>17 talking about it.</p> <p>18 Q. What part of that was not of</p> <p>19 interest to you?</p> <p>20 A. Well, living in Dubai, Mohammed</p> <p>21 Bin Salman.</p> <p>22 At first when I had originally</p> <p>23 talked to her, like the very first time before</p> <p>24 the official interview, she said that she had an</p>	<p>Page 398</p> <p>1 We are off the record.</p> <p>2 The time is 6:12 p.m.</p> <p>3 Back on the record.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Ma'am, are the skills that you</p> <p>6 learned at the Forum helping you perform your job</p> <p>7 duties right now?</p> <p>8 A. Some of them. Most though came</p> <p>9 from institutional knowledge from Congressman</p> <p>10 Costello's office, because it's on the Hill.</p> <p>11 It's a different venue.</p> <p>12 Q. How is your life going right now?</p> <p>13 MR. CARSON: How's what? What's</p> <p>14 the question?</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. My question is how is your life</p> <p>17 going right now?</p> <p>18 A. Hard.</p> <p>19 Q. Why is it hard?</p> <p>20 A. I'm away from my kids a lot.</p> <p>21 Money's tight because of the extra whole nother</p> <p>22 apartment to pay for.</p> <p>23 I have a demanding job that I</p> <p>24 love. And I love my boss. I love my co-workers.</p>
<p>Page 397</p> <p>1 office in London, Dubai and in the U.S. and that,</p> <p>2 you know, most times that people could split</p> <p>3 those things or, you know, work out of one area</p> <p>4 but travel to the others.</p> <p>5 And so that was of interest to me.</p> <p>6 But then when I spoke with her, she was more</p> <p>7 interested in having the main hub be in Saudi</p> <p>8 Arabia and I wasn't interested in that.</p> <p>9 Q. Did you ever create a Facebook</p> <p>10 page profile with the name Oliva Estranimkis?</p> <p>11 A. I don't even know what that last</p> <p>12 name is.</p> <p>13 Q. I can spell it you for.</p> <p>14 E-S-T-R-A-N-I-M-K-I-S.</p> <p>15 A. Maybe, I don't know. I don't</p> <p>16 know.</p> <p>17 Q. You don't remember that?</p> <p>18 A. I don't remember that.</p> <p>19 MR. CAVALIER: Okay. So listen, I</p> <p>20 want to ask the -- I want to go off the</p> <p>21 record for a minute and ask the court</p> <p>22 reporter how long we've been going.</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 5:59 p.m.</p>	<p>Page 399</p> <p>1 But it's not easy. Like the other</p> <p>2 day, my daughter was leaving to go home, like,</p> <p>3 back to Philly because she had school and she was</p> <p>4 crying that she wanted me to be there in the</p> <p>5 morning to do her hair. And that breaks my</p> <p>6 heart.</p> <p>7 Q. You said you love your job right</p> <p>8 now?</p> <p>9 A. I do. I love my boss.</p> <p>10 Q. You like your boss, too?</p> <p>11 A. I love him.</p> <p>12 Q. Is it safe to say then that you</p> <p>13 prefer your current job than your job at MEF?</p> <p>14 A. Oh, that's safe to say.</p> <p>15 Q. And you would not, if given the</p> <p>16 opportunity, give up your current job to go back</p> <p>17 to work for the Middle East Forum, correct?</p> <p>18 A. You would have to -- over my dead</p> <p>19 body would I ever go back to Middle East Forum.</p> <p>20 Q. Have you taken any vacations</p> <p>21 recently?</p> <p>22 A. A bunch.</p> <p>23 Q. Where to?</p> <p>24 A. Texas, Puerto Rico, Wisconsin.</p>

<p style="text-align: right;">Page 400</p> <p>1 Q. When did you go to Texas?</p> <p>2 A. A bunch of times. Like in the</p> <p>3 beginning of Corona Virus shutdown.</p> <p>4 Q. How many times have you gone to</p> <p>5 Texas over the past year?</p> <p>6 A. I think two for work -- maybe</p> <p>7 three for work. Two for personal.</p> <p>8 Q. How do you get there?</p> <p>9 A. Fly.</p> <p>10 Q. When did you go to Wisconsin?</p> <p>11 A. When did I go to Wisconsin? Right</p> <p>12 around the DNC in August.</p> <p>13 Q. Who did you go to Wisconsin with?</p> <p>14 A. Myself.</p> <p>15 Q. For vacation?</p> <p>16 A. Yeah. I was going to watch a</p> <p>17 panel discussion.</p> <p>18 Q. And where else besides Texas and</p> <p>19 Wisconsin did you go on vacation?</p> <p>20 A. Puerto Rico.</p> <p>21 Q. When did you go to Puerto Rico?</p> <p>22 A. March and December.</p> <p>23 Q. March and what?</p> <p>24 A. December.</p>	<p style="text-align: right;">Page 402</p> <p>1 That -- I do a lot of things that people would</p> <p>2 consider work, I do that for fun. Like filming</p> <p>3 or editing or writing things for people.</p> <p>4 Q. Okay. And who did you go to</p> <p>5 Puerto Rico with?</p> <p>6 A. Brian Coyne.</p> <p>7 Q. Both times?</p> <p>8 A. Yep.</p> <p>9 Q. How long did you stay the first</p> <p>10 time you went?</p> <p>11 A. Like a bunch of days. I think</p> <p>12 like 20 days or something crazy.</p> <p>13 Q. Okay. And how about the second</p> <p>14 time you went, how many days?</p> <p>15 A. Three or four, I think.</p> <p>16 Q. Okay. How did you get there?</p> <p>17 A. I flew.</p> <p>18 Q. Private?</p> <p>19 A. No. Oh, you mean like -- like a</p> <p>20 commercial airline.</p> <p>21 Q. Both times?</p> <p>22 A. Yep.</p> <p>23 Q. Did you stay at a resort?</p> <p>24 A. Yeah. Both time -- well, yeah,</p>
<p style="text-align: right;">Page 401</p> <p>1 Q. So you've been to Puerto Rico</p> <p>2 twice over the past year?</p> <p>3 A. Yeah. Oh, and I went to Florida,</p> <p>4 too.</p> <p>5 Q. Okay. And when did you go to</p> <p>6 Florida?</p> <p>7 A. Right before Christmas.</p> <p>8 Q. Okay. Who did you go to Florida</p> <p>9 with?</p> <p>10 A. My friend James.</p> <p>11 Q. Okay. Where do you know James</p> <p>12 from?</p> <p>13 A. James is a Newsmax -- actually, he</p> <p>14 is an official employee of Newsmax now. He was a</p> <p>15 contributor.</p> <p>16 And he asked me to go with him to</p> <p>17 help film. And since my kids had Corona virus at</p> <p>18 the time and I couldn't be around them, and my</p> <p>19 mother-in-law and my husband, I said, let's go.</p> <p>20 Q. Okay. And you said you were doing</p> <p>21 video work for him but still you consider that a</p> <p>22 vacation, correct?</p> <p>23 A. Yeah. I'm not getting paid. I do</p> <p>24 a lot of things that are work-related for fun.</p>	<p style="text-align: right;">Page 403</p> <p>1 like -- well, one we stayed -- the one time we</p> <p>2 stayed at a hotel and then an AirBNB.</p> <p>3 And then the second time then we</p> <p>4 were at one resort and we went back -- he</p> <p>5 currently, until his, like, new apartment in</p> <p>6 Puerto Rico is ready, occupies the presidential</p> <p>7 suite of the El San Juan Hotel.</p> <p>8 Q. Does Brian Coyne have access to a</p> <p>9 private plane?</p> <p>10 A. He just got one, yeah.</p> <p>11 Q. Have you ever been on it?</p> <p>12 A. Nope.</p> <p>13 Q. So do you get paid more now in</p> <p>14 your current job than you did at the Forum?</p> <p>15 A. Yes. But it doesn't matter,</p> <p>16 because my expenses are actually -- like I have</p> <p>17 less money to spend at the end of every month.</p> <p>18 As a matter of fact, it's so bad</p> <p>19 that usually the last two weeks of the month, I</p> <p>20 don't have any money at all.</p> <p>21 Q. Okay. But it sounds like, and you</p> <p>22 can correct me if anything I'm about to say is</p> <p>23 wrong, but you work in a job that you love,</p> <p>24 you're getting paid more money, you've been on</p>

<p style="text-align: right;">Page 404</p> <p>1 vacations over the past year, multiple times to  2 Texas, to Wisconsin, to Florida, and to Puerto  3 Rico twice.</p> <p>4 It seems like your life's in a  5 pretty good spot right now.</p> <p>6 No?</p> <p>7 A. I guess from the outward opinion,  8 if you look at it like that. But the answer's  9 no.</p> <p>10 Q. All right. So tell me why it's  11 not.</p> <p>12 A. I just explained to you.  13 My kids are not near me.  14 Right?</p> <p>15 My daughter is having emotional  16 issues from me being separated from her. So much  17 that we started counseling for my daughter.</p> <p>18 She goes down here in D.C.,  19 Virginia area every other Saturday. We are  20 having disputes about where the kids are gonna go  21 to school full-time, either down here. We are  22 interviewing for another school down here.</p> <p>23 I have, you know, all these lovely  24 lawsuits. My life is exponentially not better.</p>	<p style="text-align: right;">Page 406</p> <p>1 MEF, too, is that they are one of the places to  2 call me back and it was a conservative  3 organization. I was, like, yes.</p> <p>4 But there isn't the opportunity  5 there. And a lot of these political jobs don't  6 translate well to, like, regular people jobs.</p> <p>7 I mean, you don't know about  8 franking requirements? You know what I'm saying?  9 Or when the blackout periods are. That's the  10 institution knowledge that I was going to have  11 from working in Congress.</p> <p>12 So it was very difficult. And I  13 knew that if I left the Middle East Forum, which  14 is part of the reason why I stayed, that really  15 the only opportunity would be -- for me would be  16 in D.C. and that is exactly what happened.</p> <p>17 I got a job quickly in D.C.,  18 because this market is more set to my skill set.</p> <p>19 Q. Do you have a real estate license?  20 A. I used to. It expired.</p> <p>21 Q. Is there any particular reason  22 that you couldn't have renewed that license and  23 worked in real estate in Philadelphia if you  24 wanted to?</p>
<p style="text-align: right;">Page 405</p> <p>1 As a matter of fact, like I said, in order to  2 have my kids down here as much, I needed the  3 place that I'm staying in, which I moved outside  4 of the Washington, D.C. in order to do and  5 that -- at a reduced cost of what rent is.</p> <p>6 And even then, I'm struggling to  7 make ends meet. Like last month, the last  8 week -- work last week of the month is the way  9 that you get paid in the House only has -- you  10 only get -- what do you call it? You get paid  11 once a month and I was eating like Ramen.</p> <p>12 Q. Okay. But you're -- the fact that  13 you live in D.C., that's not something that you  14 blame MEF for, correct?</p> <p>15 A. I think that there are - I had  16 difficulty before I worked for MEF as I knew  17 Congressman Costello was transitioning, like, out  18 of Congress, that there are hardly any, unless  19 you go out to Western Pennsylvania, jobs for  20 conservatives.</p> <p>21 And I came up against that quite a  22 bit. And then, you know, I had put out resumes  23 before even when I was in my search for MEF as  24 part of the motivation at working originally at</p>	<p style="text-align: right;">Page 407</p> <p>1 A. You have to have upfront money to  2 do that. And then you have to pay money to get  3 it out of escrow. And then take two human  4 educations classes.</p> <p>5 And I'm not even sure if my thing  6 is even in escrow. I believe that it can stay  7 there for a couple years.</p> <p>8 But I didn't keep up with my  9 continuing education classes, so I'd have to take  10 the exam all over again and pay money to get my  11 license and get a thing.</p> <p>12 And let me tell you, the market  13 isn't really great. You can ask my husband.</p> <p>14 Q. Speaking of which, your husband  15 does do real estate, correct?</p> <p>16 A. Correct.</p> <p>17 Q. So he could have helped you with  18 all that, right?</p> <p>19 A. What do you mean help me? What,  20 be a real estate agent?</p> <p>21 I'm not -- I was never good at,  22 nor did I ever make any money -- sufficient money  23 being a real estate agent.</p> <p>24 Some people are not fit for</p>



<p style="text-align: right;">Page 408</p> <p>1 certain jobs. And, no, that would have taken --</p> <p>2 Think about it.</p> <p>3 You would have go to school again.</p> <p>4 You have to take the test again. That would take</p> <p>5 months and months and months of not being</p> <p>6 employed to do that.</p> <p>7 Q. Well, and to your point, you're</p> <p>8 good at your job for the Congressman, right?</p> <p>9 A. Yes. That's what I went to school</p> <p>10 for. Yes.</p> <p>11 Q. Okay. So what I'm trying to</p> <p>12 figure out from you is whether you blame the</p> <p>13 Middle East Forum for the fact that you're</p> <p>14 working in what you described as a great job for</p> <p>15 a boss you love in D.C.?</p> <p>16 A. What I blame Middle East Forum for</p> <p>17 is for their abusive behavior towards me as an</p> <p>18 employee while I was working there.</p> <p>19 And would I have loved to have</p> <p>20 stayed there and finish the good work that I</p> <p>21 thought MEF was doing and stay in Philly near my</p> <p>22 family and things like that? Yeah.</p> <p>23 Or would I have had time to, like</p> <p>24 you know, ease my way into taking a longer job</p>	<p style="text-align: right;">Page 410</p> <p>1 because at least I know these people are safe and</p> <p>2 mentally good people.</p> <p>3 I'm definitely afraid to change</p> <p>4 jobs a hundred percent.</p> <p>5 Q. I understand that.</p> <p>6 But my question wasn't -- you said</p> <p>7 earlier that you love your job. You love your</p> <p>8 boss.</p> <p>9 And what I'm trying to figure out</p> <p>10 is whether you're blaming the Middle East Forum</p> <p>11 for your current job, the fact that you work for</p> <p>12 Congressmen Weber?</p> <p>13 A. What do you mean by blame?</p> <p>14 MR. CARSON: Object to the</p> <p>15 question. Object to the form.</p> <p>16 THE DEPONENT: What I'm doing</p> <p>17 is -- I'm not blaming them for anything.</p> <p>18 What I'm blaming them for is the</p> <p>19 way they treated me and what they did to</p> <p>20 my, like, my mental capacity and all</p> <p>21 kinds of other things.</p> <p>22 I'm blaming them for having my</p> <p>23 director physically assault me and, you</p> <p>24 know, -- and then my -- the president of</p>
<p style="text-align: right;">Page 409</p> <p>1 search and things like that?</p> <p>2 No, but I had to get out of there</p> <p>3 because it was insane.</p> <p>4 Q. Okay. I understand that's what</p> <p>5 you're saying is the reason behind your decision</p> <p>6 to resign.</p> <p>7 But that was now, what, 18 months</p> <p>8 ago?</p> <p>9 A. Now I'm shell shocked. I'm</p> <p>10 afraid. I said this to somebody else.</p> <p>11 So Congressman Costello asked me</p> <p>12 the other day, like, Lis, you worked for Randy</p> <p>13 for, like, ever. Like, what do you plan to do?</p> <p>14 Where are you going to go next?</p> <p>15 I see bigger and greater things</p> <p>16 for you. And I said, no, I'm not going anywhere</p> <p>17 ever, because I have a healthy work environment</p> <p>18 and I'm so shell shocked because Ryan Costello's</p> <p>19 office was a good office.</p> <p>20 And then I went and left for the</p> <p>21 Middle East Forum and it was horrific.</p> <p>22 And, honestly, so I'm legit afraid</p> <p>23 to make a move. Americans for Prosperity reached</p> <p>24 out to me. And I'm afraid to go anywhere else,</p>	<p style="text-align: right;">Page 411</p> <p>1 the organization thinks that it's fine.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Well, just to be clear, part of</p> <p>4 your stress in working at MEF was your difficult</p> <p>5 relationship with Marnie Meyer, correct?</p> <p>6 MR. CARSON: Objection. Assuming</p> <p>7 facts not in evidence.</p> <p>8 THE DEPONENT: I did have a</p> <p>9 difficult relationship with Marnie Meyer</p> <p>10 and it was created by Greg.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Was that stressful for you?</p> <p>13 A. Yeah.</p> <p>14 Q. Okay. I just want to talk about</p> <p>15 what you said there, because it's important that</p> <p>16 I understand the distinction you're drawing.</p> <p>17 You blame -- I think you just said</p> <p>18 you blame Middle East Forum for making your life</p> <p>19 a living hell while you worked there, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Do you blame the Middle East Forum</p> <p>22 for any of your current circumstances relating to</p> <p>23 your job?</p> <p>24 A. If that job -- if my direct boss,</p>

<p style="text-align: right;">Page 412</p> <p>1 Greg Roman, was not a nightmare, I would have  2 stayed there forever and I would not be in D.C.  3 You tell me what that means. I  4 don't know what you're trying get at but that's  5 the truth.  6 Q. Are you happy working in D.C.?  7 A. Part of me is and part of me  8 isn't.  9 I said I love my job and I love my  10 boss. But do I not like being away from my  11 children.  12 I hate it as a matter of fact.  13 Q. What is your goal in pursuing this  14 lawsuit?  15 A. Justice.  16 Q. Define justice for me.  17 A. Greg Roman paying for his actions.  18 Q. Monetarily?  19 A. Being held --  20 MR. CARSON: Objection.  21 Objection. Calls for a legal conclusion.  22 It's also argumentative.  23 What other -- you want to suggest  24 some other form of resolution? We'd be</p>	<p style="text-align: right;">Page 414</p> <p>1 MR. CAVALIER: Your witness used  2 the words. I'm relying on her  3 definition.  4 MR. CARSON: To the extent she  5 understands, she's welcome to answer the  6 question. Although I think it's pretty  7 obvious, the textbook definition of  8 extortion, what happened that day.  9 But, you know, we'll get to that  10 later.  11 Lisa, you can answer the question.  12 THE DEPONENT: He said come meet  13 me, 30th Street Station. I want to  14 discuss our mutual problem.  15 And then we started -- so he said,  16 make sure your phones are off. And I'll  17 come up with a settlement agreement and  18 whatever so that we can both get rid of  19 these mutual problems without our  20 lawyers, because they just keep causing  21 trouble.  22 So I get there. Turn my own off.  23 Do everything he says. He says he thinks  24 I'm a fine person and that, like, you</p>
<p style="text-align: right;">Page 413</p> <p>1 happy to listen to it.  2 But so far as we know monetarily  3 is the only option available to us, so,  4 yes.  5 BY MR. CAVALIER:  6 Q. What does being held responsible  7 look like to you?  8 A. I think that Greg Roman should be  9 punished by the Middle East Forum and held  10 accountable for misbehavior.  11 Q. Punished how?  12 A. Fired hopefully. I said that to  13 Daniel Pipes, when he was trying to extort me.  14 Q. Pardon me?  15 A. When he was trying to extort me at  16 30th Street Station.  17 Q. Let's talk about that for a  18 second.  19 Why do you say that he was trying  20 to extort you?  21 A. Because that's definitely --  22 MR. CARSON: I'm just gonna object  23 to the extent it calls for a legal  24 conclusion as to what extortion is.</p>	<p style="text-align: right;">Page 415</p> <p>1 know, he doesn't think I'm a bad person.  2 He thinks highly of me. All this  3 nonsense.  4 And then he says, if you don't  5 crop these cases and testify against  6 Tricia and Marnie and help him with the  7 other cases, then he's gonna file a RICO  8 criminal racketeering case on me.  9 By the way, which if you ever look  10 at my finances, you know, all of them  11 from forever, I've never gotten an extra  12 penny of anything from anywhere from  13 anyone ever.  14 So tell me how that's possible?  15 He extorted me. That's what he did.  16 BY MR. CAVALIER:  17 Q. He met with you to discuss the  18 resolution of your lawsuit against the Middle  19 East Forum?  20 MR. CARSON: Let him get the  21 question out.  22 But what you just described is  23 literally the definition of extortion.  24 But go ahead.</p>

<p>Page 416</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Isn't it true that during your</p> <p>3 meeting that you just described, you discussed</p> <p>4 the resolution of your lawsuit against the Middle</p> <p>5 East Forum and the Middle East Forum's lawsuits</p> <p>6 against you?</p> <p>7 MR. CARSON: I'm gonna object.</p> <p>8 But you can answer.</p> <p>9 THE DEPONENT: A very poor</p> <p>10 mischaracterization.</p> <p>11 He said that we have resources</p> <p>12 that you do not have. He said to me, I</p> <p>13 understand how much debt that you're in.</p> <p>14 What we can do for you is we can pay for</p> <p>15 your debt resolution and solve your</p> <p>16 problem with any debt that you have.</p> <p>17 If you drop this, we'll pay for</p> <p>18 the lawyers to get you out of debt -- out</p> <p>19 of your debt whoas.</p> <p>20 And if you -- and we'll scuttle</p> <p>21 the RICO case that we're thinking about</p> <p>22 dropping on you. And that we'll do --</p> <p>23 and that we'll do that if you testify</p> <p>24 against Marnie and Tricia.</p>	<p>Page 418</p> <p>1 explained that if she testified</p> <p>2 truthfully against it, it wouldn't be</p> <p>3 helpful to the Middle East Forum.</p> <p>4 THE DEPONENT: Thank you.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Did he ask you to testify falsely?</p> <p>7 MR. CARSON: You can answer what</p> <p>8 your understanding was.</p> <p>9 THE DEPONENT: He implied.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. How was it implied?</p> <p>12 A. Because like I said, if I</p> <p>13 testified, saying everything that I've been</p> <p>14 telling you, it would certainly not help the</p> <p>15 Middle East Forum. If anything, it would hurt</p> <p>16 them.</p> <p>17 And so if he wanted me to testify</p> <p>18 against them, then it would be -- then I would</p> <p>19 have to fabricate my thing.</p> <p>20 Q. Did you get any indication from</p> <p>21 Daniel Pipes, other than your own supposition,</p> <p>22 that he was asking you to testify untruthfully?</p> <p>23 MR. CARSON: Objection. She just</p> <p>24 answered that question. Literally that</p>
<p>Page 417</p> <p>1 That's what he said.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Did he ask you to testify falsely?</p> <p>4 MR. CARSON: Objection. Object to</p> <p>5 the form of the question.</p> <p>6 The witness can answer.</p> <p>7 THE DEPONENT: Everything that I</p> <p>8 have said about what happened is a</p> <p>9 hundred percent true.</p> <p>10 And not only that, right, like, so</p> <p>11 everything's true. And then if he wants</p> <p>12 me to help them testify against them,</p> <p>13 that would be the only thing that would</p> <p>14 be left to do is lie, which I would never</p> <p>15 do.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Did you tell him that?</p> <p>18 A. Yeah. I told him that multiple</p> <p>19 times. I said under no circumstances. And that</p> <p>20 was in a -- so he drew up -- he even drew up an</p> <p>21 agreement.</p> <p>22 Q. Did he ask you to testify falsely</p> <p>23 against the other plaintiffs against the Forum?</p> <p>24 MR. CARSON: Objection. She just</p>	<p>Page 419</p> <p>1 same exact question.</p> <p>2 You can ask it a hundred times,</p> <p>3 you're going to get the same answer.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. So it's fair to say -- I'll</p> <p>6 withdraw the question.</p> <p>7 It's fair to say then that you</p> <p>8 assumed that because Daniel Pipes asked you to</p> <p>9 testify that he wanted you to testify falsely?</p> <p>10 MR. CARSON: Objection again.</p> <p>11 You can answer.</p> <p>12 THE DEPONENT: Again, what</p> <p>13 other -- if I've been doing nothing but</p> <p>14 consistently telling the truth, what</p> <p>15 would there be to help his case?</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Maybe he just wanted you to</p> <p>18 testify truthfully.</p> <p>19 A. Testify truthfully that Greg Roman</p> <p>20 assaulted us and that freaking Daniel Pipes did</p> <p>21 nothing about it?</p> <p>22 Okay.</p> <p>23 Q. Well, I mean that's not true. We</p> <p>24 know that, right?</p>

<p style="text-align: right;">Page 420</p> <p>1 MR. CARSON: Wait. Wait. Wait.</p> <p>2 What?</p> <p>3 THE DEPONENT: Do we?</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. Yeah.</p> <p>6 We know that it's not true that</p> <p>7 Daniel Pipes did nothing about it.</p> <p>8 MR. CARSON: I don't know that.</p> <p>9 But objection. Assuming facts not in</p> <p>10 evidence. Object to form.</p> <p>11 You can answer.</p> <p>12 BY MR. CAVALIER:</p> <p>13 Q. Is it your position that Daniel</p> <p>14 Pipes did nothing about the complaints that you</p> <p>15 and the other Forum plaintiffs levied in November</p> <p>16 of 2018?</p> <p>17 A. Nothing to relieve the burden of</p> <p>18 Greg Roman.</p> <p>19 It was not effective. And when we</p> <p>20 told him it wasn't effective, he didn't do</p> <p>21 anything about it.</p> <p>22 Q. So ineffective that you then asked</p> <p>23 to bring him back into the office.</p> <p>24 A. Again, I explained to you --</p>	<p style="text-align: right;">Page 422</p> <p>1 connotation of, like, this political environment</p> <p>2 that I'm in.</p> <p>3 Okay. So it was a big, huge deal</p> <p>4 for me to do that. And part of the reason is</p> <p>5 somebody had said to me, if somebody had done</p> <p>6 what you -- like going forward and tell the truth</p> <p>7 about him, this would have never happened to you.</p> <p>8 And I think about my little girl</p> <p>9 and I think about this happening to other people</p> <p>10 and what I would -- how irate I would be if it</p> <p>11 happened to any -- anybody younger that I knew</p> <p>12 that grew up and was, like, that and that is</p> <p>13 another reason.</p> <p>14 I do not want this to ever happen</p> <p>15 again. And the more we shed light on it and the</p> <p>16 more we talk about it and the more we talk about</p> <p>17 how it's not just and right and wrong and then</p> <p>18 the better this world will be.</p> <p>19 Q. So your purpose in bringing this</p> <p>20 lawsuit is to make the world a better place?</p> <p>21 A. Part of it, yeah.</p> <p>22 MR. CARSON: Objection.</p> <p>23 Argumentative.</p> <p>24 THE DEPONENT: Fine. That's true,</p>
<p style="text-align: right;">Page 421</p> <p>1 MR. CARSON: Objection. It's not</p> <p>2 even a question.</p> <p>3 THE DEPONENT: We're going around</p> <p>4 in a circle here.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. So I want to go back to my</p> <p>7 original question.</p> <p>8 You said you hoped to get justice</p> <p>9 and I asked you what that meant to you and you</p> <p>10 said seeing Greg Roman punished, fired.</p> <p>11 Do you have any other goals in</p> <p>12 bringing this lawsuit?</p> <p>13 A. That's my goals.</p> <p>14 Q. Your goal in this lawsuit --</p> <p>15 A. And it's also to protect anybody</p> <p>16 else that would be -- you know, that had this</p> <p>17 happen.</p> <p>18 That was actually -- listen, it's</p> <p>19 very hard for a conservative women in the world</p> <p>20 of Me Too to come out and say, listen, this</p> <p>21 happened to me, too. That is very hard for me to</p> <p>22 do.</p> <p>23 And it is very negative. That</p> <p>24 whole idea of it is very negative in the</p>	<p style="text-align: right;">Page 423</p> <p>1 though.</p> <p>2 I don't know if you know much</p> <p>3 about me. But you will know that I am</p> <p>4 consistent in my principles.</p> <p>5 And I will tell you that the whole</p> <p>6 reason that I do the job that I do and</p> <p>7 the reason that I worked for Middle East</p> <p>8 Forum was not for a paycheck.</p> <p>9 I can go in the private sector</p> <p>10 right now and make double the money.</p> <p>11 Okay?</p> <p>12 But you have to do something that</p> <p>13 is contributing to society. And that was</p> <p>14 always the way.</p> <p>15 That was always the way when I</p> <p>16 worked at Middle East Forum, too. You</p> <p>17 have to do something that you believe is</p> <p>18 contributing to society.</p> <p>19 Instead of just, you know,</p> <p>20 catching a buck on some poor, helpless</p> <p>21 girl who has been sexually assaulted.</p> <p>22 BY MR. CAVALIER:</p> <p>23 Q. If the Forum fired Greg Roman,</p> <p>24 would that satisfy you with respect to this</p>



<p>1 lawsuit?</p> <p>2 MR. CARSON: Objection. I'm just</p> <p>3 gonna object. These questions are very</p> <p>4 inappropriate.</p> <p>5 THE DEPONENT: What do you want</p> <p>6 from me?</p> <p>7 MR. CARSON: He wants to be able</p> <p>8 to argue to the Judge that he can play</p> <p>9 for a jury that --</p> <p>10 MR. CAVALIER: Improper, Seth,</p> <p>11 again.</p> <p>12 THE DEPONENT: I know what he</p> <p>13 wants.</p> <p>14 MR. CARSON: Which he will never</p> <p>15 be allowed to do, which is why these</p> <p>16 questions are inappropriate entirely.</p> <p>17 MR. CAVALIER: I just want</p> <p>18 truthful questions to my answer.</p> <p>19 THE DEPONENT: I just gave you a</p> <p>20 truthful answer.</p> <p>21 MR. CARSON: We all know what this</p> <p>22 lawsuit is about.</p> <p>23 This lawsuit is about justice and</p> <p>24 the way our civil justice system</p>	<p>Page 424</p> <p>1 harassment, sexual assault, sexual anything, it</p> <p>2 is not -- is only doing it for the money and not</p> <p>3 just justice.</p> <p>4 MR. CARSON: I also object to it</p> <p>5 being argumentative, because she actually</p> <p>6 is equated to a rape victim.</p> <p>7 MR. CAVALIER: By you.</p> <p>8 MR. CARSON: By us, you're right,</p> <p>9 by the case.</p> <p>10 MR. CAVALIER: No, by you. Not by</p> <p>11 her own words.</p> <p>12 THE DEPONENT: I'm a sexual</p> <p>13 assault victim. I have not been raped.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. So you brought up Breanna Taylor.</p> <p>16 She got \$12 million, correct?</p> <p>17 A. I don't know how much she got</p> <p>18 honestly.</p> <p>19 Q. I'll represent to you that she got</p> <p>20 \$12 million.</p> <p>21 MR. CARSON: We don't know that.</p> <p>22 THE DEPONENT: Her family did.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Correct. Because she was killed.</p>
<p>Page 425</p> <p>1 identifies and defines justice is through</p> <p>2 monetary fines.</p> <p>3 That's how we regulate the system.</p> <p>4 THE DEPONENT: Wait.</p> <p>5 Do women that are raped, right,</p> <p>6 raped and beat, do they bring cases</p> <p>7 because they want the money?</p> <p>8 Did Breanna Taylor's family bring</p> <p>9 a case because they wanted the money? Or</p> <p>10 because they thought that the court</p> <p>11 system was neglect in their actions -- or</p> <p>12 the police station?</p> <p>13 I mean, you tell me -- you tell me</p> <p>14 what the reason is for -- for these type</p> <p>15 of lawsuits and the reason that</p> <p>16 they're -- the function that they're set</p> <p>17 up for this way.</p> <p>18 This is my recourse. The only</p> <p>19 recourse I have.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Are you equating yourself to a</p> <p>22 rape victim?</p> <p>23 A. I'm going with your line of</p> <p>24 reasoning that anybody who has suffered sexual</p>	<p>Page 427</p> <p>1 A. Okay.</p> <p>2 MR. CARSON: Where are we going --</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. At one point you demanded</p> <p>5 \$27 million from the Forum.</p> <p>6 MR. CARSON: I'm gonna go ahead</p> <p>7 and object. That's not true.</p> <p>8 THE DEPONENT: That's not true.</p> <p>9 That's not even remotely true.</p> <p>10 BY MR. CAVALIER:</p> <p>11 Q. So you're not demanding \$27</p> <p>12 million?</p> <p>13 MR. CARSON: Whoa, whoa, Lisa,</p> <p>14 wait. Just wait.</p> <p>15 Our initial disclosures speak for</p> <p>16 themselves and we're not going to talk</p> <p>17 about settlement numbers right here.</p> <p>18 MR. CAVALIER: I'm not asking in</p> <p>19 term of settlement. I'm asking in terms</p> <p>20 of the amount of money that would be</p> <p>21 justice for you.</p> <p>22 MR. CARSON: She's not going to</p> <p>23 answer that question.</p> <p>24 THE DEPONENT: You're right. I'm</p>

<p style="text-align: right;">Page 428</p> <p>1 not going to answer that.</p> <p>2 BY MR. CAVALIER:</p> <p>3 Q. Why not?</p> <p>4 A. Because I don't --</p> <p>5 MR. CARSON: She's not going to</p> <p>6 answer that question because she doesn't</p> <p>7 understand the question.</p> <p>8 And because the question is</p> <p>9 designed to embarrass and harass her.</p> <p>10 Has nothing to do with why we are here</p> <p>11 today. It's totally irrelevant.</p> <p>12 Never gonna go in front of a jury.</p> <p>13 You can't talk about settlement</p> <p>14 discussion and negotiations and demands</p> <p>15 and offers. All protected information.</p> <p>16 So we're just arguing now for no</p> <p>17 reason.</p> <p>18 MR. CAVALIER: I don't know why</p> <p>19 you think I'm talking about settlement</p> <p>20 discussions.</p> <p>21 MR. CARSON: You're asking her</p> <p>22 what her demand was, how much she asked</p> <p>23 for.</p> <p>24 THE DEPONENT: And that's not even</p>	<p style="text-align: right;">Page 430</p> <p>1 You don't know have to answer.</p> <p>2 It's argumentative.</p> <p>3 THE DEPONENT: I don't know. It</p> <p>4 would depend. I don't know.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. That's a fair answer.</p> <p>7 MR. CARSON: Her answer is subject</p> <p>8 to my objection.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. Have you ever spoken to Tiffany</p> <p>11 Lee?</p> <p>12 A. No.</p> <p>13 Q. You made allegations in your</p> <p>14 complaint concerning Tiffany Lee.</p> <p>15 How did those allegations come to</p> <p>16 be in your complaint?</p> <p>17 MR. CARSON: I'm gonna object and</p> <p>18 tell her not answer based on</p> <p>19 attorney/client privilege.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. This is a yes or no question.</p> <p>22 Is the sole source of your</p> <p>23 information relating to Tiffany Lee your</p> <p>24 attorneys?</p>
<p style="text-align: right;">Page 429</p> <p>1 what I asked for.</p> <p>2 MR. CARSON: Lisa, you don't have</p> <p>3 to say anything.</p> <p>4 The initial disclosure that we</p> <p>5 filed or that we provided speak for</p> <p>6 themselves.</p> <p>7 MR. CAVALIER: That's not what I'm</p> <p>8 asking. But I'll re-ask the question</p> <p>9 again and you can levy your objection</p> <p>10 again.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. My question is -- how much -- you</p> <p>13 said you want to get justice out of this lawsuit.</p> <p>14 My question to you is how much</p> <p>15 money is justice?</p> <p>16 MR. CARSON: I'm going to object.</p> <p>17 The amount of money that is determined</p> <p>18 will be determined by the jury in this</p> <p>19 case.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. If a jury awards you a dollar,</p> <p>22 would you consider that justice?</p> <p>23 MR. CARSON: Objection. You don't</p> <p>24 have to answer.</p>	<p style="text-align: right;">Page 431</p> <p>1 MR. CARSON: You can say yes or no</p> <p>2 to that.</p> <p>3 THE DEPONENT: No.</p> <p>4 BY MR. CAVALIER:</p> <p>5 Q. What are the other sources of your</p> <p>6 information relating to Tiffany Lee?</p> <p>7 A. Greg Roman's own words. Matt</p> <p>8 Bennett's words. A bunch of peoples' words.</p> <p>9 Daniel Pipes' words.</p> <p>10 Q. Did -- strike that.</p> <p>11 When you worked with Congressman</p> <p>12 Costello, did his wife ever tell you to stay away</p> <p>13 from her husband?</p> <p>14 A. No.</p> <p>15 Q. Did you ever try to hire a hacker?</p> <p>16 A. No.</p> <p>17 Q. Did you ever talk to Lisa -- or to</p> <p>18 Patricia about hiring a hacker?</p> <p>19 A. I said a hacker was hired and that</p> <p>20 was-ism if actually -- you want me to explain</p> <p>21 what that is --</p> <p>22 MR. CARSON: I mean, we did this</p> <p>23 during the last deposition.</p> <p>24 THE DEPONENT: For your own</p>

<p>1 clarification, I'll do it again.</p> <p>2 Mark Fink and Daniel Pipes were</p> <p>3 interested in suing Facebook on behalf of</p> <p>4 Tommy Robinson.</p> <p>5 Facebook had erased Tommy</p> <p>6 Robinson's account. Okay. Fine.</p> <p>7 We petitioned Facebook for Tommy</p> <p>8 Robinson's old data. They were reluctant</p> <p>9 to give it back. Reluctant. Reluctant.</p> <p>10 Reluctant. Reluctant.</p> <p>11 So Tommy said that he hired -- or</p> <p>12 he was trying to get somebody he knew was</p> <p>13 a hacker to break in and get, like, his</p> <p>14 old data back, so that we could prove in</p> <p>15 court that what MEF was saying wasn't</p> <p>16 true. Whatever.</p> <p>17 That never came to fruition. I</p> <p>18 finally got a congressional contact in</p> <p>19 the Facebook world from my congressional</p> <p>20 contacts that I had prior to MEF and I</p> <p>21 got them to supply the data and give to</p> <p>22 it Mark Fink.</p> <p>23 All at the direction of the Middle</p> <p>24 East Forum, by the way.</p>	<p>Page 432</p>	<p>1 these types of questions.</p> <p>2 THE DEPONENT: But he is aware.</p> <p>3 MR. CARSON: I think I've done</p> <p>4 probably depositions in 50 cases in the</p> <p>5 last 12 months.</p> <p>6 Never, not once has anyone asked</p> <p>7 these types of questions of any of my</p> <p>8 clients.</p> <p>9 They're designed to harass.</p> <p>10 They're designed threaten. They're</p> <p>11 designed to embarrass. They're totally</p> <p>12 insignificant.</p> <p>13 What does it matter if he knows</p> <p>14 about it? What possibly could that have</p> <p>15 to do with this case?</p> <p>16 It's a threat. It's a veiled</p> <p>17 threat, you know. And we have a -- we</p> <p>18 have a hard stop at 7.</p> <p>19 So if you want to spend the next</p> <p>20 17 minutes threatening my client, we'll</p> <p>21 just stop now.</p> <p>22 MR. CAVALIER: The hard stop is at</p> <p>23 7:17, first of all.</p> <p>24 Secondly --</p>	<p>Page 434</p>
<p>1 BY MR. CAVALIER:</p> <p>2 Q. Did you ever help Tommy Robinson</p> <p>3 to try to get a Visa?</p> <p>4 A. Yep. Again, at the direction of</p> <p>5 the Middle East Forum.</p> <p>6 Q. Well, did you ever help or try to</p> <p>7 help Tommy Robinson get a Visa after you left the</p> <p>8 Middle East Forum?</p> <p>9 A. No.</p> <p>10 Q. Since --</p> <p>11 A. He has not even reapplied.</p> <p>12 Q. Have you tried to assist Tommy</p> <p>13 Robinson in getting a Visa since you've worked</p> <p>14 for Congressman Weber?</p> <p>15 A. No.</p> <p>16 Q. Does the Congressman know about</p> <p>17 this litigation?</p> <p>18 A. Yes. You served him. Or you</p> <p>19 served me at his office and you served him. So,</p> <p>20 yeah, he is well aware.</p> <p>21 And he was well aware from the</p> <p>22 time I got hired. I told him the day that I got</p> <p>23 --</p> <p>24 MR. CARSON: I'm also troubled by</p>	<p>Page 433</p>	<p>1 MR. CARSON: You told me that when</p> <p>2 you took the last 12-minute break that --</p> <p>3 you said would be five minutes.</p> <p>4 THE DEPONENT: Correct.</p> <p>5 MR. CAVALIER: The hard stop is at</p> <p>6 7:17.</p> <p>7 MR. CARSON: I'm letting you know</p> <p>8 what time we are stopping.</p> <p>9 MR. CAVALIER: Then we can come</p> <p>10 back later for the last 17 minutes, if</p> <p>11 you want to stop at 7.</p> <p>12 Seth, beyond that, I take issue</p> <p>13 with the fact that you're extremely loose</p> <p>14 on the record with throwing around</p> <p>15 allegations against my clients, and</p> <p>16 counsel, including but not limited to me.</p> <p>17 And I'm gonna caution you --</p> <p>18 MR. CARSON: You don't have to</p> <p>19 caution me.</p> <p>20 MR. CAVALIER: I am cautioning you</p> <p>21 from doing that.</p> <p>22 MR. CARSON: You don't have to.</p> <p>23 I'll save you --</p> <p>24 MR. CAVALIER: In the history of</p>	<p>Page 435</p>

<p>1 this case --</p> <p>2 MR. CARSON: What you just did is</p> <p>3 a threat.</p> <p>4 MR. CAVALIER: If you have an</p> <p>5 issue with my conduct, you're welcome to</p> <p>6 file a motion. That's how we handle it.</p> <p>7 MR. CARSON: If you want to spend</p> <p>8 the last 17 minutes threatening my</p> <p>9 client, we can stop now.</p> <p>10 MR. CAVALIER: I mean, last week</p> <p>11 you called Mr. Roman a rapist on the</p> <p>12 record.</p> <p>13 MR. CARSON: Well, what do you</p> <p>14 call it when you compel a young child, a</p> <p>15 girl, who's barely, you know, barely 20</p> <p>16 years old, to have sex with you and you</p> <p>17 hold a piece of paper that she signed</p> <p>18 over her head?</p> <p>19 And the next time you try to have</p> <p>20 sex with that person and you don't have a</p> <p>21 piece paper to hold over her head, she</p> <p>22 doesn't want to have sex with you?</p> <p>23 What do you call that? That seems</p> <p>24 like compulsion to me.</p>	<p>Page 436</p> <p>1 Q. Tell me about the conversation.</p> <p>2 How did it start?</p> <p>3 A. That Greg Roman is going around</p> <p>4 telling people that you had sex with him. Did</p> <p>5 you?</p> <p>6 She said what happened.</p> <p>7 She said they were drinking at a</p> <p>8 party or at some networking event or something in</p> <p>9 Israel. He said, I have to finish -- after they</p> <p>10 were drinking, he said, I have to finish your</p> <p>11 intern paperwork.</p> <p>12 Why don't you come up to my room</p> <p>13 and I'll sign it there. And then they had sex.</p> <p>14 And then she said that she never wanted anything</p> <p>15 to do with him again, but she didn't want to talk</p> <p>16 about it anymore.</p> <p>17 Q. When did this conversation happen?</p> <p>18 A. I believe it was in 2000 -- I</p> <p>19 don't know. I don't know, a long time -- at</p> <p>20 least a year or two ago.</p> <p>21 Q. While you were still at the Forum?</p> <p>22 A. I think so, yeah.</p> <p>23 Q. Did she tell you that Greg Roman</p> <p>24 raped her?</p>
<p>Page 437</p> <p>1 MR. CAVALIER: We're talking about</p> <p>2 facts not in evidence. And here I</p> <p>3 thought that was yet another verbal typo</p> <p>4 by you. You're actually standing behind</p> <p>5 that.</p> <p>6 MR. CARSON: That feels very rapey</p> <p>7 to me.</p> <p>8 THE DEPONENT: Leah Murville</p> <p>9 admitted to me that that is what</p> <p>10 happened.</p> <p>11 MR. CAVALIER: So you're standing</p> <p>12 behind the fact that you called Mr. Roman</p> <p>13 a rapist on the record?</p> <p>14 MR. CARSON: The record speaks for</p> <p>15 itself.</p> <p>16 MR. CAVALIER: I tend to agree</p> <p>17 with you there, sir.</p> <p>18 MR. CARSON: You're right.</p> <p>19 BY MR. CAVALIER:</p> <p>20 Q. What did you speak to Leah about?</p> <p>21 A. About her thing with Greg.</p> <p>22 Q. When did you speak with her?</p> <p>23 A. At least a year or two ago. 2017.</p> <p>24 I don't remember.</p>	<p>Page 439</p> <p>1 A. You just heard the story. She</p> <p>2 said she never wanted to hear from him again.</p> <p>3 Q. Did she say Greg Roman raped her?</p> <p>4 A. Did not use those words, no. But</p> <p>5 you're -- but, you know, that, like, -- she's an</p> <p>6 intern.</p> <p>7 A position of power saying come up</p> <p>8 to my room and I'll sign your paperwork to your</p> <p>9 school so you get school credit for your</p> <p>10 internship and winds up sleeping with the girl</p> <p>11 and then she doesn't want anything to do with him</p> <p>12 after that?</p> <p>13 You tell me what you think that</p> <p>14 is.</p> <p>15 Q. Frankly, I think it's a long way</p> <p>16 from rape, but that's just me.</p> <p>17 You're aware that when Greg Roman</p> <p>18 signed those papers for her, she was no longer an</p> <p>19 MEF employee or an intern?</p> <p>20 MR. CARSON: Objection.</p> <p>21 THE DEPONENT: Her internship</p> <p>22 would not have been finalized had he not</p> <p>23 signed those papers.</p> <p>24</p>



<p style="text-align: right;">Page 440</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. When you talked to Leah Murville,</p> <p>3 did you believe she had been raped?</p> <p>4 A. I believe she was forced into a</p> <p>5 very uncomfortable situation, yes.</p> <p>6 Q. Do you believe she was raped?</p> <p>7 MR. CARSON: Asked and answered.</p> <p>8 Objection.</p> <p>9 MR. CAVALIER: It wasn't answered.</p> <p>10 MR. CARSON: Yes, she said I</p> <p>11 believe -- we can read back the</p> <p>12 transcript.</p> <p>13 I believe she was forced in a very</p> <p>14 uncomfortable situation. Yes, that was</p> <p>15 her answer.</p> <p>16 BY MR. CAVALIER:</p> <p>17 Q. Do you believe every uncomfortable</p> <p>18 sexual situation is rape?</p> <p>19 MR. CARSON: Objection.</p> <p>20 Argumentative.</p> <p>21 THE DEPONENT: I think we</p> <p>22 established from the Me Too movement that</p> <p>23 casting couches and the behavior of Harry</p> <p>24 Weinstein is predatory and that is</p>	<p style="text-align: right;">Page 442</p> <p>1 actually say I didn't want to do it. I</p> <p>2 was raped. So I don't know.</p> <p>3 But I was very concerned that Greg</p> <p>4 Roman was a rapist at that point in time,</p> <p>5 yeah.</p> <p>6 Do I know for a fact that he raped</p> <p>7 her or not? I don't.</p> <p>8 Does my gut tell me that what he</p> <p>9 did to that poor girl was wrong? And</p> <p>10 that had he never had that paperwork, he</p> <p>11 would have never had sex with her? Does</p> <p>12 my gut tell me that? Yes.</p> <p>13 So I don't know if he's a rapist,</p> <p>14 but my intuition tells me --</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. Did you go to Daniel Pipes?</p> <p>17 MR. CARSON: Objection. You have</p> <p>18 the document where they reported it to</p> <p>19 Daniel Pipes.</p> <p>20 Like, you can answer.</p> <p>21 BY MR. CAVALIER:</p> <p>22 Q. Did you go Daniel Pipes and tell</p> <p>23 him that Greg Roman raped Leah Murville?</p> <p>24 MR. CARSON: Objection. Asked and</p>
<p style="text-align: right;">Page 441</p> <p>1 exactly what Greg Roman has displayed in</p> <p>2 that event.</p> <p>3 So you tell me what Harry</p> <p>4 Weinstein is. Is he a rapist?</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Do you believe every uncomfortable</p> <p>7 situation is rape?</p> <p>8 MR. CARSON: Do you really want</p> <p>9 her to answer that question? Do you</p> <p>10 believe that every uncomfortable</p> <p>11 situation is rape? That's his question,</p> <p>12 Lisa.</p> <p>13 THE DEPONENT: That's hypothetical</p> <p>14 and I don't know.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. So did you come out of your</p> <p>17 conversation with Leah Murville believing that</p> <p>18 she been raped by Greg Roman?</p> <p>19 MR. CARSON: Objection. Asked and</p> <p>20 answered.</p> <p>21 THE DEPONENT: I told her that I</p> <p>22 was very concerned about her. And I</p> <p>23 don't know. I still even don't know.</p> <p>24 A lot of people are afraid to</p>	<p style="text-align: right;">Page 443</p> <p>1 answered.</p> <p>2 But you can answer.</p> <p>3 THE DEPONENT: Again. Again, I'm</p> <p>4 not the one. I was very concerned about</p> <p>5 her. I was very concerned about her.</p> <p>6 But I'm not the one that wrote up</p> <p>7 the agreement.</p> <p>8 I'm not the one that did those --</p> <p>9 that thing.</p> <p>10 And the reason why I didn't was</p> <p>11 because I don't go around, unless I have</p> <p>12 proof, reporting things to people that</p> <p>13 aren't true.</p> <p>14 Now, you're forcing me under oath</p> <p>15 to answer these questions. Okay. But I</p> <p>16 normally don't go around and say, guess</p> <p>17 what, I think Greg Roman raped a girl,</p> <p>18 because that's what I think.</p> <p>19 Okay. I don't --</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. That's your counsel that does</p> <p>22 that?</p> <p>23 MR. CARSON: Objection, the record</p> <p>24 speaks for itself.</p>

<p style="text-align: right;">Page 444</p> <p>1 THE DEPONENT: That's not a</p> <p>2 question. Don't even answer him.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. I'm asking you if you agree with</p> <p>5 your counsel that Greg Roman is a rapist?</p> <p>6 MR. CARSON: Objection.</p> <p>7 MR. CAVALIER: It's now on the</p> <p>8 record at two different depositions that</p> <p>9 your counsel has made and I'm asking you</p> <p>10 if --</p> <p>11 MR. CARSON: I didn't use the word</p> <p>12 rape today.</p> <p>13 Whoa, whoa, wait, wait, wait.</p> <p>14 First, let me object. I didn't</p> <p>15 use the word rape today. You did.</p> <p>16 All right. Second of all, the</p> <p>17 transcript from the last deposition is</p> <p>18 going to speak for itself.</p> <p>19 So, third of all, I'm gonna object</p> <p>20 that that question is designed to</p> <p>21 embarrass and harass.</p> <p>22 You're insulting me. You're</p> <p>23 insulting her. So you don't have to</p> <p>24 answer that question.</p>	<p style="text-align: right;">Page 446</p> <p>1 serious allegation?</p> <p>2 MR. CARSON: Objection. You can</p> <p>3 answer if you think it's a serious</p> <p>4 allegation.</p> <p>5 You know, like our complaint</p> <p>6 speaks for itself. The record speaks for</p> <p>7 itself.</p> <p>8 THE DEPONENT: I don't think we</p> <p>9 filed any official documents that call</p> <p>10 him a rapist.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. No. But you've called him many</p> <p>13 things, correct?</p> <p>14 MR. CARSON: Objection. We</p> <p>15 haven't called him anything. We have</p> <p>16 stated facts.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Right.</p> <p>19 So if you believed that Greg Roman</p> <p>20 was a rapist, it's fair to assume that that would</p> <p>21 have been in your complaint, right?</p> <p>22 A. Oh, no. No. I only put things in</p> <p>23 the complaint --</p> <p>24 MR. CARSON: Lisa, just wait.</p>
<p style="text-align: right;">Page 445</p> <p>1 THE DEPONENT: And I'm also --</p> <p>2 excuse me. I will say something.</p> <p>3 He has never said that in any of</p> <p>4 my depositions, so I'm not gonna speak to</p> <p>5 something that you say that he said in</p> <p>6 another deposition, because I never heard</p> <p>7 him say that.</p> <p>8 I can't agree with what he thinks.</p> <p>9 I don't know what he thinks about Greg</p> <p>10 Roman. That's it.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. I'm not gonna belabor this point</p> <p>13 anymore. But he just said, less than a few</p> <p>14 minutes ago, what would you call it when someone</p> <p>15 takes a child, a young girl of but 20, puts her</p> <p>16 in an uncomfortable situation and pressures her</p> <p>17 into sex.</p> <p>18 A. I don't think he said pressured</p> <p>19 her or any of those words.</p> <p>20 MR. CARSON: Objection. That's</p> <p>21 not even a question. Object to the form</p> <p>22 and she's not gonna answer statements.</p> <p>23 BY MR. CAVALIER:</p> <p>24 Q. Don't you think that's a very</p>	<p style="text-align: right;">Page 447</p> <p>1 Just objection. All right. Object to</p> <p>2 the form of the question. It's</p> <p>3 argumentative. Assuming facts not in</p> <p>4 evidence. Calls for a legal conclusion.</p> <p>5 THE DEPONENT: Evidence-based,</p> <p>6 Buddy.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. Right. Right.</p> <p>9 And you have no evidence that Greg</p> <p>10 Roman is a rapist, correct?</p> <p>11 A. I have some evidence, none of</p> <p>12 which I think is substantial enough to call him a</p> <p>13 rapist.</p> <p>14 Q. Fine.</p> <p>15 Which is why it's not in your</p> <p>16 complaint.</p> <p>17 A. Right. Just like that's the same</p> <p>18 reason why I didn't tell MEF about Danny and this</p> <p>19 money, because there wasn't substantial</p> <p>20 information to accuse people of that.</p> <p>21 MR. CARSON: It's -- there's also</p> <p>22 stating incorrect facts, what I</p> <p>23 described --</p> <p>24 THE DEPONENT: Don't worry about</p>

<p>1 it.</p> <p>2 MR. CARSON: -- is what's in the</p> <p>3 complaint.</p> <p>4 Go ahead.</p> <p>5 BY MR. CAVALIER:</p> <p>6 Q. Who's George Egler?</p> <p>7 A. Some man that had been working</p> <p>8 with Tommy a bunch back and forth. And he, like,</p> <p>9 gives his opinion a lot to, like, Tommy and what</p> <p>10 Tommy should do and things like that.</p> <p>11 Q. I'm not sure I understand.</p> <p>12 A. Because I don't -- really</p> <p>13 don't understand -- I don't know what George</p> <p>14 Egler, what his actual job is.</p> <p>15 I know that, like, during the</p> <p>16 Tommy campaign, he would, like, e-mail me what he</p> <p>17 thinks, like, press releases, the way they should</p> <p>18 go out or the way, you know, we should word</p> <p>19 things or frame things.</p> <p>20 And he sends me, like, these long</p> <p>21 paragraphs. Well, he doesn't really anymore,</p> <p>22 but -- about, like, MEF and things he saw in the</p> <p>23 news.</p> <p>24 And, you know, that's the extent</p>	<p>Page 448</p> <p>1 But I really don't want to live in</p> <p>2 Texas. It's always like a fleeting little</p> <p>3 fantasy I have.</p> <p>4 I get excited about things. I</p> <p>5 wanted to move to France when I was 25 because I</p> <p>6 went there one time on a weekend trip. Ireland,</p> <p>7 too, I think in grad school.</p> <p>8 I could move to Texas if I really</p> <p>9 wanted to.</p> <p>10 MR. CARSON: What are we doing</p> <p>11 right now?</p> <p>12 THE DEPONENT: I don't know. He's</p> <p>13 not saying anything and I'm tired.</p> <p>14 MR. CARSON: I know.</p> <p>15 If we are gonna take one-minute</p> <p>16 breaks in between every question, I think</p> <p>17 it means we're done.</p> <p>18 MR. CAVALIER: You can think</p> <p>19 whatever you want. It's done when I say</p> <p>20 it's done.</p> <p>21 MR. CARSON: It's not done when</p> <p>22 you say it's done, actually. It's done</p> <p>23 when it's done.</p> <p>24 And we've been here since 10 this</p>
<p>Page 449</p> <p>1 of what I know about George Egler. I met him in</p> <p>2 person one time. We had a conversation about</p> <p>3 Tommy and that was it.</p> <p>4 Q. What's your relationship with him</p> <p>5 today?</p> <p>6 A. Nothing. I haven't spoken to him</p> <p>7 in forever.</p> <p>8 Q. Okay.</p> <p>9 A. He's a nice man.</p> <p>10 Q. Do you recall talking to him about</p> <p>11 your work with Tommy?</p> <p>12 A. Yeah. That's the only reason he</p> <p>13 was talking to me. He's, like, a long-time Tommy</p> <p>14 reporter person. Tommy is the one who gave him</p> <p>15 my information.</p> <p>16 Q. Do you recall talking to him about</p> <p>17 your desire to move to England?</p> <p>18 A. Probably. I liked England. Just</p> <p>19 like I wanted to move to Texas last month. Or in</p> <p>20 March. I always want to move somewhere.</p> <p>21 Q. Why did you want to move to Texas?</p> <p>22 A. Texas is great. They're no Corona</p> <p>23 Virus. No restrictions. Just want to move.</p> <p>24 Take my kids with me and move.</p>	<p>Page 451</p> <p>1 morning. So it's nine hours. And the</p> <p>2 reason it's taken nine hours is because</p> <p>3 every hour you've taken a break because</p> <p>4 you weren't ready to do the deposition</p> <p>5 today.</p> <p>6 MR. CAVALIER: I very much</p> <p>7 appreciate the comedy in you telling me</p> <p>8 how to be a lawyer, but --</p> <p>9 MR. CARSON: I mean, that's you.</p> <p>10 I need to get myself organized.</p> <p>11 That's why the last 12-minute break that</p> <p>12 you said would be five minutes occurred.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Who is Cassandra Fairbanks?</p> <p>15 A. A friend of mine.</p> <p>16 Q. What does she do?</p> <p>17 A. She's a reporter.</p> <p>18 Q. What does she report on?</p> <p>19 A. All kinds of things.</p> <p>20 Q. Does she report on things having</p> <p>21 to do with the Middle East Forum?</p> <p>22 A. I'm sure she does, yeah. I think</p> <p>23 she just wrote an article about it.</p> <p>24 Q. Have you ever been a source for</p>

<p>1 one of her stories?</p> <p>2 A. Let me just tell you something. I</p> <p>3 know where you're going with this. So if you</p> <p>4 want, I'll tell you.</p> <p>5 MR. CARSON: Answer yes or no.</p> <p>6 THE DEPONENT: No.</p> <p>7 Cassandra Fairbanks -- I met her</p> <p>8 with Tommy Robinson. I met her while she</p> <p>9 was covering one of things one of the</p> <p>10 times I was over in England. That's how</p> <p>11 we met.</p> <p>12 She's very good friends with</p> <p>13 Tommy. She's very good friends with</p> <p>14 everybody that is over in England.</p> <p>15 That's how I met her.</p> <p>16 I met her in England, not here in</p> <p>17 America, number one.</p> <p>18 Number two is, she has a feed, an</p> <p>19 RSS feed or whatever it is, Google alerts</p> <p>20 kind of thing, for Tommy Robinson.</p> <p>21 When she saw that hit piece that</p> <p>22 they put out on me two days before</p> <p>23 Christmas that had specific information</p> <p>24 from our private deposition testimony or</p>	<p>Page 452</p> <p>1 Q. Have you ever talked to Cassandra</p> <p>2 Fairbanks about this case?</p> <p>3 A. Yes.</p> <p>4 Q. What have you talked about?</p> <p>5 A. Multiple occasions. All of it.</p> <p>6 I've been talking about this case</p> <p>7 with people that are close to me, because it's so</p> <p>8 stressful since -- since I filed it.</p> <p>9 Q. What people?</p> <p>10 A. My friends. I'm a human being</p> <p>11 that has friends. Friends. I have tons of</p> <p>12 friends.</p> <p>13 Q. Who are they? Who have you spoken</p> <p>14 to about this case?</p> <p>15 A. Everybody. My mom. My dad. Amy.</p> <p>16 My brother. His wife. Everybody. Everybody</p> <p>17 that I am friends with.</p> <p>18 My work -- all of my work</p> <p>19 colleagues, because they were there when you guys</p> <p>20 served me.</p> <p>21 I mean, it's not like you guys</p> <p>22 aren't putting it out there.</p> <p>23 The people that I come in contact</p> <p>24 with that ask me about it, I tell them.</p>
<p>Page 453</p> <p>1 whatever, she's, like, she knew the whole</p> <p>2 thing.</p> <p>3 She knew the whole thing. She</p> <p>4 knew about the tapes. She knew about</p> <p>5 everything way before. She's known</p> <p>6 everything about it since day one,</p> <p>7 because she's my friend -- like my actual</p> <p>8 friend. Our kids play together.</p> <p>9 Okay. She knows about MEF and all</p> <p>10 that stuff. And so it was not my</p> <p>11 decision for her to write that piece.</p> <p>12 Don't you dare start assuming that</p> <p>13 that was on me. That was on you.</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. I wasn't assuming anything. I</p> <p>16 just asked if you've ever been a source for her</p> <p>17 story.</p> <p>18 A. We know what you're doing.</p> <p>19 Please, sir.</p> <p>20 Q. I'll ask the question again.</p> <p>21 A. No.</p> <p>22 Q. Have you ever been a source for</p> <p>23 Cassandra Fairbanks on a story?</p> <p>24 A. No.</p>	<p>Page 455</p> <p>1 Q. What do you tell them?</p> <p>2 A. What do you mean what do I tell</p> <p>3 them?</p> <p>4 Depends on what question they ask</p> <p>5 me.</p> <p>6 I mean, do you want me to sit here</p> <p>7 and talk about -- I don't remember all of it.</p> <p>8 Again, like the McDonald thing --</p> <p>9 MR. CARSON: You said you don't</p> <p>10 remember all of it. Let's keep it</p> <p>11 moving.</p> <p>12 THE DEPONENT: I don't know.</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. Well, do you give them your</p> <p>15 interpretation of what's going on in the</p> <p>16 litigation?</p> <p>17 A. What other -- what other</p> <p>18 interpretation is there other than the facts?</p> <p>19 Q. Well, I'm assuming you don't</p> <p>20 just -- don't hand them the complaint and say,</p> <p>21 hear, read for yourself, right?</p> <p>22 A. There have been times where people</p> <p>23 ask me and I said, look, it's online, if you want</p> <p>24 to read it, go read it.</p>



<p style="text-align: right;">Page 456</p> <p>1 There are other times where former</p> <p>2 employees from Middle East Forum -- I didn't tell</p> <p>3 them anything about it. They called me up and</p> <p>4 said, hey, I read the complaint. You need any</p> <p>5 help? I would love to testify against them.</p> <p>6 They did the same thing to me.</p> <p>7 Q. Who are those people?</p> <p>8 A. Samantha Mandeles.</p> <p>9 Q. Okay. That's one.</p> <p>10 A. Grayson Levy.</p> <p>11 Q. Okay. Anyone else?</p> <p>12 A. E.J. Kimbel. I mean, I could keep</p> <p>13 going. These people all contact me. They all</p> <p>14 read the docket. They didn't get it from me.</p> <p>15 Q. Yeah, I would like to know who all</p> <p>16 the people are.</p> <p>17 A. I just told you who they are.</p> <p>18 Q. Well, you told me three. And then</p> <p>19 you said you could keep going.</p> <p>20 I'd like you to keep going.</p> <p>21 A. Yeah, so Grayson -- Grayson, E.J.,</p> <p>22 I believe Cliff.</p> <p>23 Who else did I just say?</p> <p>24 Cassandra read the docket. What's her face?</p>	<p style="text-align: right;">Page 458</p> <p>1 People are concerned because they</p> <p>2 know that Greg's wrong.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. So what did Grayson talk about</p> <p>5 with you?</p> <p>6 A. Nothing. He just said, hey, they</p> <p>7 filed a RICO case. We talked about this earlier</p> <p>8 today.</p> <p>9 Q. I'm asking if he said anything</p> <p>10 else. You said he reached out to you.</p> <p>11 A. This is ridiculous.</p> <p>12 Q. He just reached out to you and</p> <p>13 said, hey, head's up, they filed a RICO case and</p> <p>14 that was it?</p> <p>15 A. He goes -- no, he said --</p> <p>16 MR. CARSON: We already did this</p> <p>17 today. This is how we started.</p> <p>18 THE DEPONENT: He's like, Lis,</p> <p>19 they did -- they're filing a RICO case</p> <p>20 against you. Did you know that? And I</p> <p>21 was, like, what? He said, it was filed</p> <p>22 four days ago. Whatever day that was.</p> <p>23 And I was like, well, I haven't</p> <p>24 been served. I haven't heard anything</p>
<p style="text-align: right;">Page 457</p> <p>1 Samantha Mandeles, Benjamin Baird.</p> <p>2 And I can't remember all of them,</p> <p>3 but all these people have said, I saw the</p> <p>4 complaints about you. Ahman Patel.</p> <p>5 A bunch of people.</p> <p>6 Q. Okay. Your testimony is that they</p> <p>7 all reached out to you offering to help?</p> <p>8 MR. CARSON: Objection. That</p> <p>9 wasn't her testimony.</p> <p>10 You can answer.</p> <p>11 THE DEPONENT: My thing is that</p> <p>12 they reach out to me. Most of them said,</p> <p>13 I'm so sorry, if you need anything, you</p> <p>14 want us to testify about how Greg Roman</p> <p>15 was, let us know. And most of all of</p> <p>16 them said it.</p> <p>17 Now, Grayson didn't say that</p> <p>18 and -- Grayson didn't say that and</p> <p>19 neither did Benji.</p> <p>20 But Benji was, like, I'm sorry.</p> <p>21 Benjamin was the one that said, hey,</p> <p>22 Lisa, weird stuff is going on with Greg's</p> <p>23 access and all, like, your husband's</p> <p>24 stuff in the LexusNexus program.</p>	<p style="text-align: right;">Page 459</p> <p>1 about it. He said, well, read it online.</p> <p>2 And I think he sent me the link to it.</p> <p>3 And I was like -- and he's like,</p> <p>4 they're insane. And I said, I know. I</p> <p>5 said, do you still work there? He said,</p> <p>6 kind of.</p> <p>7 BY MR. CAVALIER:</p> <p>8 Q. Did he tell you anything about</p> <p>9 what he thought of the case other than that it's</p> <p>10 ridiculous?</p> <p>11 A. No.</p> <p>12 MR. CARSON: Ridiculous is a</p> <p>13 pretty good descriptor, don't you think,</p> <p>14 for the RICO case?</p> <p>15 MR. CAVALIER: Do you have any</p> <p>16 idea how bad you look on a transcript,</p> <p>17 Seth?</p> <p>18 THE DEPONENT: Who cares?</p> <p>19 MR. CARSON: You want to tell me</p> <p>20 what your opinion is? Go ahead.</p> <p>21 All right. We are at 7:01. We've</p> <p>22 been on the record for 11 hours -- I'm</p> <p>23 sorry, for nine hours.</p> <p>24 THE DEPONENT: We already talked</p>

<p>1 about this.</p> <p>2 MR. CARSON: We've been here since</p> <p>3 10. Sorry.</p> <p>4 MR. CAVALIER: I'll let your</p> <p>5 counsel finish.</p> <p>6 MR. CARSON: Currently, let's just</p> <p>7 take a recount. Okay?</p> <p>8 It is 7:01. We started at 10. So</p> <p>9 that's nine hours.</p> <p>10 The reason why we're still here is</p> <p>11 because of all these breaks that we took</p> <p>12 today, so that you could get organized,</p> <p>13 which we accommodated you on.</p> <p>14 If you have any other questions,</p> <p>15 besides insulting me, insulting my</p> <p>16 client, threatening my client, we'll give</p> <p>17 you another five minutes.</p> <p>18 But, you know, you've got to wrap</p> <p>19 this up.</p> <p>20 MR. CAVALIER: Can the court</p> <p>21 reporter please let us know how much time</p> <p>22 remains in the seven hours for this</p> <p>23 deposition?</p> <p>24 THE VIDEOGRAPHER: The last break</p>	<p>Page 460</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. I'm answering your counsel.</p> <p>3 A. You keep on one upping everybody.</p> <p>4 MR. CAVALIER: We're going until</p> <p>5 I'm done.</p> <p>6 MR. CARSON: We're gonna go</p> <p>7 until -- we are not going to go until</p> <p>8 you're done.</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. Have you ever spoken to any</p> <p>11 reporter about this case?</p> <p>12 A. A lot of reporters reached out to</p> <p>13 me. I think I said -- I responded to one in the</p> <p>14 Daily Mail. He didn't give me a chance to</p> <p>15 answer.</p> <p>16 I do not -- I think my exact words</p> <p>17 were, I did not know, I do not know and I still</p> <p>18 do not know about any misappropriated funds.</p> <p>19 That's the only thing I've ever said.</p> <p>20 Q. What reporters reached out to you?</p> <p>21 A. The Daily Mail, the Times, the</p> <p>22 Sun, an affiliate for one of the English ones</p> <p>23 here in -- based in LA. A bunch. A ton.</p> <p>24 Q. When did that start?</p>
<p>Page 461</p> <p>1 we were at five hours and 55 minutes.</p> <p>2 So if we go to 7:17, like you had</p> <p>3 mentioned, that would be seven hours.</p> <p>4 THE DEPONENT: That's 15 minutes</p> <p>5 in case anybody needed the math.</p> <p>6 MR. CARSON: The last break you</p> <p>7 promised would be five minutes and it was</p> <p>8 12 minutes and it was so that you could</p> <p>9 get yourself organized. So I think that</p> <p>10 time should count.</p> <p>11 MR. CAVALIER: You're just wasting</p> <p>12 more time, Seth. And believe me, do not</p> <p>13 have a debate with me about coming back</p> <p>14 from breaks late or showing up for</p> <p>15 depositions late.</p> <p>16 MR. CARSON: That gives you three</p> <p>17 minutes.</p> <p>18 THE DEPONENT: You guys are all</p> <p>19 wasting time now.</p> <p>20 MR. CAVALIER: I'm telling you, if</p> <p>21 your counsel hadn't been speechifying all</p> <p>22 day, we would have been well done.</p> <p>23 THE DEPONENT: You're speechifying</p> <p>24 right this minute.</p>	<p>Page 463</p> <p>1 A. December 21st, 22nd, I think.</p> <p>2 Maybe earlier.</p> <p>3 Q. When was the last time it</p> <p>4 happened?</p> <p>5 A. Well, recently I believe.</p> <p>6 Q. And you said you only said to</p> <p>7 them --</p> <p>8 A. That one thing.</p> <p>9 I said, you didn't let -- you</p> <p>10 didn't give me an opportunity to respond --</p> <p>11 because apparently, like, they at Twitter</p> <p>12 messaged me to get -- to ask me something.</p> <p>13 And I -- like the way Twitter</p> <p>14 works, that if they're not already your friend,</p> <p>15 it goes into, like, a message request.</p> <p>16 And I'm hardly on Twitter. And I</p> <p>17 certainly don't check my message requests like</p> <p>18 that.</p> <p>19 So I think one of their things</p> <p>20 was, like, -- they sent me the thing like a</p> <p>21 couple days before they published the article.</p> <p>22 And they never, like, even waited for a response</p> <p>23 from me.</p> <p>24 So I said, you never even got --</p>

<p style="text-align: right;">Page 464</p> <p>1 you never even waited to hear from me, I said.  2 But in any event, I don't know anything about  3 misappropriated funds. I didn't then. And I  4 still do not today. That's all I said.  5 But I will say what's funny is  6 that private pictures that turned up in the  7 telegraph, private pictures of me and Danny Tioro  8 that turned up in Telegraph that only we have in  9 deposition. It was me, my lawyer and you guys.  10 I've never put them on social  11 media. Isn't it funny how that turned up in  12 there?  13 Isn't it funny that they have a  14 quote from Daniel Pipes in the Times article?  15 And isn't it funny that they started talking  16 about their relationship with Danny Tomo and  17 whatever happened to it, but they specifically  18 reference in there that they haven't had a  19 comment from Danny Tomo or Jasmine Bishop.  20 So where did they get their  21 information from the story from? Certainly not  22 me. Certainly not from my legal counsel.  23 Certainly not from Danny Tomo or Jasmine Bishop,  24 because they quoted it.</p>	<p style="text-align: right;">Page 466</p> <p>1 bad that I had my husband read it and just give  2 me the synopsis, because it hurt me to hear  3 anything, lies like that, printed about me in  4 black and white.  5 I'm not good at that.  6 Q. Have you reviewed --  7 A. Painful to relive this. I have to  8 relive this all the time. It's painful to think  9 about it.  10 This is a very painful process.  11 And the fact that you are -- the way that you try  12 to undermine things and to twist things and to  13 make it worse, and then to see the things that  14 you lie and make up about me, it's very, very  15 painful.  16 I'm sorry that you don't like that  17 answer. But that's the truth.  18 And so I'm not reading everything  19 that you guys write about me, because I can't.  20 It hurts too much. It's an effective cognitive  21 dissonance.  22 Q. Have you read the counterclaim  23 exhibits in the case?  24 A. No.</p>
<p style="text-align: right;">Page 465</p> <p>1 But there is a quote in there from  2 Daniel Pipes. And there is stuff from our  3 private depositions that are in that hearing --  4 or, I mean, in that article. Two days before  5 Christmas. And they put my boss' picture in  6 there.  7 MR. CARSON: For the record, those  8 pictures were turned over subject to a  9 protective order.  10 THE DEPONENT: They were.  11 BY MR. CAVALIER:  12 Q. Have you read the counterclaims in  13 this case?  14 A. Again --  15 Q. I asked you this earlier in your  16 deposition and you said no. So between that  17 deposition and now, have you read the  18 counterclaims?  19 A. No, I told you, I'm not reading  20 this stuff.  21 I talk to my attorney. I don't  22 have time to read, you know, 70 pages of stuff.  23 As a matter of fact, the one time  24 you guys made a counterclaim, I heard it was so</p>	<p style="text-align: right;">Page 467</p> <p>1 Q. Are you still seeing your  2 psychiatrist?  3 A. Kind of. I'm still -- I'm in  4 between, because she is helping me find a new one  5 that -- you know, she's not supposed to be -- my  6 one was not supposed to be long-term, and --  7 Stephanie.  8 And she's helping me find a new  9 one that is gonna be able to, like, take me on  10 long time.  11 It's very hard to get a therapist  12 for long-term thing.  13 Q. Why -- I'm not following you. Why  14 isn't she supposed to be long-term?  15 A. My therapist is part of a, like,  16 med management program through Mindula. And  17 they're not meant to be for extended periods of  18 time. That's just not what they -- they're like,  19 if you're making progress and you're getting  20 better, that's their goal and then they move on.  21 But since I'm pretty much, like,  22 hovering in the same area with ups and downs, she  23 recommended that -- and she got a promotion. She  24 recommended that I go to somebody else.</p>

<p style="text-align: right;">Page 468</p> <p>1 She did not love the trauma</p> <p>2 therapist that I was working with that I</p> <p>3 originally went to, Joanne Kim. She didn't love</p> <p>4 her too much because she didn't really give</p> <p>5 structure.</p> <p>6 And so we have been working on</p> <p>7 finding a new one. So that's what we're gonna</p> <p>8 do.</p> <p>9 Q. When was the last time you saw</p> <p>10 Stephanie?</p> <p>11 A. I don't remember. It's all a</p> <p>12 blur.</p> <p>13 I've been hovering with doctor</p> <p>14 appointments. I was just in the ER last Thursday</p> <p>15 for another kidney stone, a kidney infection.</p> <p>16 I have follow-up appointments</p> <p>17 through there. Podiatry appointments.</p> <p>18 My kids have had COVID. It's been</p> <p>19 like -- and the Capitol was raided. Like, it's</p> <p>20 been a while.</p> <p>21 And not due to not needing to go</p> <p>22 to her. If anything, I still need to go to her.</p> <p>23 But it's just been a legit role.</p> <p>24 My mom was just in the hospital for her kidney</p>	<p style="text-align: right;">Page 470</p> <p>1 your treatment collectively?</p> <p>2 A. No, she gives her -- she's not</p> <p>3 like a -- she's like an intake -- I don't know</p> <p>4 how to explain what she is.</p> <p>5 She goes over the stuff that she</p> <p>6 talks about with me. She talks to a</p> <p>7 psychiatrist. They speak about recommending</p> <p>8 medication.</p> <p>9 Then they give what their</p> <p>10 recommendations are to my doctor and he actually</p> <p>11 prescribes it.</p> <p>12 Q. Okay. Have you -- so I'm a little</p> <p>13 unclear.</p> <p>14 A. I'm still taking medicine, if</p> <p>15 that's what you're asking.</p> <p>16 Q. Okay. What medicine are you still</p> <p>17 taking?</p> <p>18 A. I'm taking Zoloft 50-milligram and</p> <p>19 Adderall.</p> <p>20 Q. Okay. And those are long-term</p> <p>21 meds, correct?</p> <p>22 A. Uh-huh.</p> <p>23 Q. Do you remember meeting with a Dr.</p> <p>24 Barbara Ziv?</p>
<p style="text-align: right;">Page 469</p> <p>1 stones and had a surgery.</p> <p>2 I am doing a million things on top</p> <p>3 of all these lawsuits and, you know, sometimes</p> <p>4 I'm the last priority. And my kids come first.</p> <p>5 Q. Okay. And I respect the fact that</p> <p>6 you can't give me an exact date as to the last</p> <p>7 time you saw Stephanie.</p> <p>8 But can you give me a ballpark?</p> <p>9 Was it in fall? Was it in summer?</p> <p>10 A. No, it was like a month or so ago.</p> <p>11 Q. Okay. That's why I'm asking.</p> <p>12 Are you planing to see Stephanie</p> <p>13 again?</p> <p>14 A. Stephanie and I are communicating</p> <p>15 via e-mail. And I have to, like, find another</p> <p>16 one and she reports to my doctor, Dr. Max</p> <p>17 O'Shalim.</p> <p>18 Q. You said he's your doctor. What</p> <p>19 kind of doctor is he?</p> <p>20 A. My regular primary care. That's</p> <p>21 how I got her in the first place.</p> <p>22 Q. Okay. So her reports go to your</p> <p>23 primary care.</p> <p>24 Does your primary care then manage</p>	<p style="text-align: right;">Page 471</p> <p>1 A. Yeah.</p> <p>2 Q. You say that with a chuckle.</p> <p>3 Why do you do that?</p> <p>4 MR. CARSON: Objection. I didn't</p> <p>5 hear any chuckle.</p> <p>6 THE DEPONENT: Barbara Ziv, I</p> <p>7 didn't read her report, but I heard that</p> <p>8 she -- I don't know.</p> <p>9 I don't think I've ever seen her</p> <p>10 report. But I heard that she had</p> <p>11 fabricated some stuff about another</p> <p>12 patient of hers, so...</p> <p>13 BY MR. CAVALIER:</p> <p>14 Q. What did you hear?</p> <p>15 MR. CARSON: Objection. Don't</p> <p>16 answer the question. It's</p> <p>17 attorney/client privilege.</p> <p>18 BY MR. CAVALIER:</p> <p>19 Q. You're claiming privilege?</p> <p>20 MR. CARSON: I'm not going to tell</p> <p>21 you what I told her. Yeah. I'm claiming</p> <p>22 privilege.</p> <p>23 Next question.</p> <p>24</p>



<p style="text-align: right;">Page 472</p> <p>1 THE DEPONENT: He is right to</p> <p>2 claim privilege. Trust me.</p> <p>3 BY MR. CAVALIER:</p> <p>4 Q. Oh, I think the Court might have</p> <p>5 to figure that out.</p> <p>6 MR. CARSON: They will. All</p> <p>7 right. They will figure it out.</p> <p>8 Due to attorney/client privilege,</p> <p>9 she's not going to answer the next</p> <p>10 question.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. Other than Mr. Carson, do you have</p> <p>13 any information that Dr. Barbara Ziv fabricated</p> <p>14 information about a patient?</p> <p>15 A. I don't.</p> <p>16 MR. CARSON: Objection. The only</p> <p>17 way that she could answer that question</p> <p>18 is if she's violating attorney/client</p> <p>19 privilege.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. The question is other than</p> <p>22 anything she spoke with you about, does she have</p> <p>23 any information or evidence?</p> <p>24 MR. CARSON: The only information</p>	<p style="text-align: right;">Page 474</p> <p>1 Did you not just hear me say that?</p> <p>2 Q. When did you get it?</p> <p>3 MR. CARSON: Objection.</p> <p>4 THE DEPONENT: I don't know.</p> <p>5 MR. CARSON: What does it matter?</p> <p>6 What are we talking about here? I mean,</p> <p>7 whatever.</p> <p>8 If you want to spend the last</p> <p>9 minute or two asking about the report, go</p> <p>10 ahead.</p> <p>11 MR. CAVALIER: I'll take your</p> <p>12 suggestion. Let's do that.</p> <p>13 THE DEPONENT: Is this her report?</p> <p>14 BY MR. CAVALIER:</p> <p>15 Q. Yes. The report that you haven't</p> <p>16 read, right?</p> <p>17 You've never seen this before?</p> <p>18 MR. CARSON: Take your time and</p> <p>19 read the whole thing before you answer</p> <p>20 any questions.</p> <p>21 THE DEPONENT: I absolutely will.</p> <p>22 MR. CAVALIER: I would love it if</p> <p>23 you read the whole thing.</p> <p>24 THE DEPONENT: Go ahead. Keep</p>
<p style="text-align: right;">Page 473</p> <p>1 that she has related to Dr. Ziv and her</p> <p>2 fabricated report came through me.</p> <p>3 THE DEPONENT: I have --</p> <p>4 MR. CARSON: You can answer the</p> <p>5 question.</p> <p>6 THE DEPONENT: I have asked to see</p> <p>7 her report, which I haven't had the</p> <p>8 opportunity to have or review at the</p> <p>9 moment.</p> <p>10 But I would like -- I -- that</p> <p>11 woman had said some kind things to me</p> <p>12 during that -- that thing.</p> <p>13 She said that how I was feeling</p> <p>14 was understandable even at a point. So</p> <p>15 I'm very curious to read that. And I</p> <p>16 would love to read it.</p> <p>17 But until I read that report that</p> <p>18 she wrote on me, I don't have anything to</p> <p>19 discuss with you about Barbara Ziv.</p> <p>20 BY MR. CAVALIER:</p> <p>21 Q. Is there any reason that you</p> <p>22 haven't read it yet? Just too busy?</p> <p>23 A. I just haven't had the</p> <p>24 opportunity.</p>	<p style="text-align: right;">Page 475</p> <p>1 going.</p> <p>2 Okay.</p> <p>3 MR. CARSON: Can you scroll back</p> <p>4 up a little? I wasn't done that last</p> <p>5 paragraph.</p> <p>6 THE DEPONENT: Please go back up.</p> <p>7 MR. CARSON: Go back up a little</p> <p>8 bit, please?</p> <p>9 Thank you.</p> <p>10 THE DEPONENT: Okay. I don't</p> <p>11 know.</p> <p>12 You can move on.</p> <p>13 MR. CARSON: All right. You can</p> <p>14 go to the next page.</p> <p>15 Whoa, you went too far.</p> <p>16 MR. CAVALIER: So you guys are</p> <p>17 aware, if you're going to read this,</p> <p>18 you're going to read the whole thing.</p> <p>19 It's 33 pages long and I'm gonna ask one</p> <p>20 question about it when we're done.</p> <p>21 THE DEPONENT: Just ask the</p> <p>22 question, because I remember what I said</p> <p>23 to her. I'll read it later.</p> <p>24 MR. CARSON: Well, I don't want</p>

<p>1 her really answering questions --</p> <p>2 THE DEPONENT: Well, let's see</p> <p>3 what the question is and see if I need</p> <p>4 the context of the whole thing to read</p> <p>5 it.</p> <p>6 Probably get this over with. We</p> <p>7 got one minute. I don't want to have to</p> <p>8 come back.</p> <p>9 MR. CARSON: We're not coming</p> <p>10 back.</p> <p>11 BY MR. CAVALIER:</p> <p>12 Q. I would like you to read the</p> <p>13 conclusions.</p> <p>14 Actually, I'd like you to first</p> <p>15 read this paragraph and then review the</p> <p>16 conclusions.</p> <p>17 A. She's hired by you to give the</p> <p>18 report that you want. Anyway, I'll read it.</p> <p>19 Q. Let me know when you're done</p> <p>20 reading the highlighted portion.</p> <p>21 A. That is not true at all. This is</p> <p>22 so crazy. This is crazy. I'm done.</p> <p>23 Q. Do you agree that you do not</p> <p>24 display any psychiatric symptoms that can be</p>	<p>Page 476</p> <p>1 true.</p> <p>2 MR. CARSON: I mean, if you gave</p> <p>3 her an opportunity --</p> <p>4 THE DEPONENT: Mrs. Barbounis'</p> <p>5 life is little changed from her life when</p> <p>6 she was working at MEF.</p> <p>7 Really? Because I live in a</p> <p>8 different state. I don't live in the</p> <p>9 same building with my kids.</p> <p>10 I don't live in the same -- my</p> <p>11 kids go to two different schools. I work</p> <p>12 at a completely different job.</p> <p>13 So that line right there is a</p> <p>14 hundred percent false.</p> <p>15 BY MR. CAVALIER:</p> <p>16 Q. My question was, do you agree that</p> <p>17 you do not display any psychiatric symptoms that</p> <p>18 can be attributed to your tenure at Middle East</p> <p>19 Forum?</p> <p>20 MR. CARSON: I put an objection on</p> <p>21 the record that you're asking her to make</p> <p>22 a medical diagnosis.</p> <p>23 To the extent she can, she can try</p> <p>24 to answer.</p>
<p>Page 477</p> <p>1 attributed to your tenure at the Middle East</p> <p>2 Forum?</p> <p>3 MR. CARSON: Objection. Wait.</p> <p>4 Wait. I'm gonna put an objection on the</p> <p>5 record. Okay?</p> <p>6 So the objection is you're asking</p> <p>7 her to make a medical diagnosis of</p> <p>8 herself. I object to the form of the</p> <p>9 question.</p> <p>10 You can answer if you</p> <p>11 understand --</p> <p>12 THE DEPONENT: I'll tell you</p> <p>13 exactly --</p> <p>14 MR. CARSON: -- what the actual</p> <p>15 symptoms are.</p> <p>16 THE DEPONENT: I'll tell you</p> <p>17 exactly what I disagree with in her.</p> <p>18 Okay. Mrs. Barbounis' life</p> <p>19 currently is little changed from her life</p> <p>20 when she was working at Middle East</p> <p>21 Forum. False. False. It is un -- it is</p> <p>22 remarkably different. It is remarkably</p> <p>23 different.</p> <p>24 So that line right there, not</p>	<p>Page 479</p> <p>1 THE DEPONENT: I do not agree with</p> <p>2 that statement, because for the 10</p> <p>3 years -- the 10 years prior to working at</p> <p>4 MEF, I did not need psychiatric</p> <p>5 evaluations.</p> <p>6 I was wonderful at my job. I had</p> <p>7 none of this up and down nonsense.</p> <p>8 When I worked in Congress for --</p> <p>9 BY MR. CAVALIER:</p> <p>10 Q. I'm gonna cut you off --</p> <p>11 A. Excuse me. For Gerlach before</p> <p>12 then, no.</p> <p>13 You don't get to cut me off. I'm</p> <p>14 sorry, sir.</p> <p>15 Q. I'm going to ask the last question</p> <p>16 here.</p> <p>17 MR. CARSON: She wasn't done her</p> <p>18 answer. You've got to let her finish her</p> <p>19 answer.</p> <p>20 THE DEPONENT: I'll let you have</p> <p>21 your extra time to ask me one more</p> <p>22 question. Let me finish my --</p> <p>23 MR. CARSON: No, I don't agree to</p> <p>24 that. It's 7:17.</p>

<p>Page 480</p> <p>1 The deposition --</p> <p>2 THE DEPONENT: So let me finish my</p> <p>3 answer and you can have your one more</p> <p>4 question.</p> <p>5 MR. CARSON: No.</p> <p>6 MR. CAVALIER: I agree to that.</p> <p>7 Go ahead.</p> <p>8 MR. CARSON: No more questions.</p> <p>9 You can finish your answer. But</p> <p>10 we're done after that.</p> <p>11 MR. CAVALIER: No, I'm lthe</p> <p>12 witness' invitation. You're welcome to</p> <p>13 --</p> <p>14 MR. CARSON: No. No. No. We are</p> <p>15 done. 7:17. You got your seven hours.</p> <p>16 We're done.</p> <p>17 BY MR. CAVALIER:</p> <p>18 Q. Ma'am, you're welcome to finish</p> <p>19 your answer if you want to. If you choose not</p> <p>20 to, that's fine, too.</p> <p>21 A. I don't even remember where we</p> <p>22 were now.</p> <p>23 MR. CARSON: All right.</p> <p>24</p>	<p>Page 482</p> <p>1 THE VIDEOGRAPHER: This closes the</p> <p>2 deposition. 7:17.</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p>Page 481</p> <p>1 BY MR. CAVALIER:</p> <p>2 Q. Do you agree that you have</p> <p>3 problems related to self-esteem and emotional</p> <p>4 regulation and unrelated to and not exacerbated</p> <p>5 by events of the Middle East Forum?</p> <p>6 A. They were certainly exacerbated by</p> <p>7 --</p> <p>8 MR. CARSON: Wait. Wait. Wait.</p> <p>9 Wait. Yeah. I'm gonna object to the</p> <p>10 question, in that once again you're</p> <p>11 calling for her to make medical</p> <p>12 diagnoses. She's not an expert. She's</p> <p>13 is not here to give her opinion. She is</p> <p>14 here to talk about facts. It's a yes or</p> <p>15 no question.</p> <p>16 Do you agree with line number two?</p> <p>17 THE DEPONENT: No.</p> <p>18 MR. CARSON: Okay. We're all</p> <p>19 done.</p> <p>20 MR. CAVALIER: We're done.</p> <p>21 THE REPORTER: Mr. Carson, would</p> <p>22 you like a copy?</p> <p>23 MR. CARSON: Yeah. I'll take a</p> <p>24 copy.</p>	

1 COUNTY OF LANCASTER :  
2 : SS  
3 COMMONWEALTH OF PENNSYLVANIA:

4 I, Joyce A. Wise, RMR, Court Reporter  
5 and Notary Public, do hereby certify that LISA  
6 REYNOLDS BARBOUNIS, the witness, personally  
7 appeared before me, being first duly sworn or  
8 affirmed to testify to the truth, the whole  
9 truth, and nothing but the truth, in answer to  
10 the oral questions propounded to him by the  
11 attorneys for the respective parties, testified  
12 as set forth in the foregoing deposition.

13 I further certify that before taking of  
14 said deposition, the above witness was duly sworn  
15 or affirmed, that the questions and answers were  
16 taken down stenographically by the said Joyce A.  
17 Wise, RMR, approved and agreed to, and afterwards  
18 reduced to print by means of computer-aided  
19 transcription under the direction of the  
20 aforesaid Reporter.

21 In testimony whereof, I have hereunto  
22 subscribed my hand this 15th day of February  
23 2021.

24 \_\_\_\_\_  
Joyce A. Wise, RMR  
Notary Public



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classify (1)	companies (1)	connected (2)	coordinating (1)
Claus (1)	company (4)	connection (7)	copies (1)
clause (2)	compel (1)	connections (13)	copy (4)
clean (1)	compensation (1)	connotation (5)	copying (1)
clear (44)	competitor (1)	conscious (1)	core (1)
cleared (1)	compilation (1)	consent (4)	corner (1)
clearly (18)	compiled (2)	consequences (1)	Corona (4)
clears (1)	complain (3)	conservative (10)	coroner (1)
click (1)	complained (4)	conservatives (1)	corporate (8)
clicked (1)	complaint (23)	consider (11)	correct (211)
client (9)	complaints (6)	consideration (1)	corrected (1)
clients (2)	complete (6)	considered (3)	correctly (4)
client's (2)	completely (6)	considering (4)	correspond (1)
Cliff (1)	complicated (2)	consistent (1)	correspondence (1)
clock (1)	compulsion (1)	consistently (1)	Corsovek (1)
close (6)	computer (4)	conspiratorial (2)	cost (1)
closes (1)	computer-aided (1)	constantly (3)	Costello (4)
clothes (1)	computerized (1)	constituents (1)	Costello's (3)
cloud (4)	conceded (1)	constitute (1)	couches (1)
cloud-based (1)	concept (1)	constitutes (3)	Counsel (29)
code (1)	conceptualize (1)	consultancy (1)	counseled (1)
coding (2)	concern (12)	contact (6)	counseling (1)
co-equal (1)	concerned (11)	contacted (8)	counsel's (6)
cognitive (1)	concerning (1)	contacting (1)	count (1)
collaborative (1)	concerns (2)	contacts (7)	counterclaim (2)
colleagues (1)	concisely (1)	contained (1)	counterclaims (5)
collectively (1)	conclusion (32)	contains (1)	countered (1)
colloquial (1)	conclusions (2)	contemplating (1)	COUNTY (1)
color (1)		content (3)	couple (13)
comb (1)		contents (5)	course (13)

<b>Court</b> (26)	<b>dare</b> (1)	<b>demonstration</b> (1)	<b>directing</b> (2)
<b>courtesy</b> (1)	<b>data</b> (4)	<b>demos</b> (1)	<b>direction</b> (5)
<b>courtroom</b> (2)	<b>date</b> (29)	<b>denied</b> (4)	<b>directive</b> (5)
<b>courts</b> (1)	<b>DATE/TIME</b> (1)	<b>denying</b> (1)	<b>directives</b> (6)
<b>Court's</b> (1)	<b>dated</b> (6)	<b>depend</b> (3)	<b>directly</b> (12)
<b>cover</b> (1)	<b>dates</b> (4)	<b>Depends</b> (1)	<b>director</b> (47)
<b>covered</b> (2)	<b>dating</b> (5)	<b>DEPONENT</b> (290)	<b>directors</b> (13)
<b>covering</b> (1)	<b>daughter</b> (3)	<b>deposed</b> (4)	<b>disagree</b> (4)
<b>COVID</b> (2)	<b>day</b> (45)	<b>DEPOSITION</b> (63)	<b>disagreed</b> (5)
<b>co-workers</b> (2)	<b>days</b> (9)	<b>depositions</b> (10)	<b>disagreement</b> (8)
<b>Coyne</b> (2)	<b>dead</b> (1)	<b>DEREK</b> (1)	<b>disagreements</b> (6)
<b>COZEN</b> (2)	<b>deal</b> (9)	<b>derive</b> (1)	<b>disagrees</b> (1)
<b>crap</b> (3)	<b>dealing</b> (1)	<b>derived</b> (1)	<b>disappear</b> (1)
<b>crazy</b> (14)	<b>dealings</b> (1)	<b>derogatory</b> (1)	<b>disciplinary</b> (1)
<b>create</b> (2)	<b>death</b> (1)	<b>describe</b> (7)	<b>discipline</b> (1)
<b>created</b> (1)	<b>debate</b> (1)	<b>described</b> (7)	<b>disciplined</b> (3)
<b>credentials</b> (3)	<b>debt</b> (5)	<b>describing</b> (1)	<b>disclosed</b> (1)
<b>credibility</b> (3)	<b>December</b> (13)	<b>description</b> (3)	<b>disclosure</b> (1)
<b>credit</b> (2)	<b>decide</b> (7)	<b>descriptor</b> (1)	<b>disclosures</b> (1)
<b>criminal</b> (11)	<b>decided</b> (9)	<b>designation</b> (2)	<b>Discourse</b> (1)
<b>crop</b> (1)	<b>decides</b> (1)	<b>designed</b> (18)	<b>discovery</b> (7)
<b>crossed</b> (1)	<b>decision</b> (13)	<b>desire</b> (1)	<b>discrimination</b> (2)
<b>crowd</b> (1)	<b>decision-making</b> (1)	<b>desk</b> (1)	<b>discuss</b> (13)
<b>crush</b> (6)	<b>decisions</b> (25)	<b>despite</b> (2)	<b>discussed</b> (7)
<b>crushy</b> (1)	<b>deep</b> (2)	<b>destroy</b> (1)	<b>discussing</b> (1)
<b>cry</b> (1)	<b>defend</b> (1)	<b>details</b> (2)	<b>discussion</b> (8)
<b>crying</b> (6)	<b>Defendant</b> (6)	<b>detective</b> (10)	<b>discussions</b> (6)
<b>curiosity</b> (3)	<b>defendants</b> (4)	<b>determination</b> (1)	<b>disenfranchised</b> (1)
<b>curious</b> (6)	<b>defendant's</b> (1)	<b>determine</b> (1)	<b>disgusting</b> (2)
<b>current</b> (17)	<b>define</b> (3)	<b>determined</b> (3)	<b>dismiss</b> (1)
<b>currently</b> (4)	<b>defined</b> (1)	<b>development</b> (1)	<b>disparage</b> (1)
<b>cursor</b> (1)	<b>defines</b> (1)	<b>device</b> (7)	<b>display</b> (2)
<b>curve</b> (1)	<b>defini</b> (1)	<b>devices</b> (3)	<b>displayed</b> (1)
<b>cut</b> (7)	<b>definitely</b> (11)	<b>devoted</b> (1)	<b>dispute</b> (2)
<b>cute</b> (1)	<b>definition</b> (8)	<b>diagnoses</b> (1)	<b>disputes</b> (1)
	<b>Delaney</b> (45)	<b>diagnosis</b> (4)	<b>disrespect</b> (1)
<b>&lt; D &gt;</b>	<b>Delaney's</b> (4)	<b>Diaz</b> (1)	<b>dissonance</b> (1)
<b>D.C</b> (15)	<b>Delany</b> (1)	<b>DiBianca</b> (1)	<b>distinction</b> (15)
<b>D.C.'s</b> (1)	<b>delete</b> (11)	<b>dick</b> (4)	<b>DISTRICT</b> (4)
<b>dad</b> (1)	<b>deleted</b> (4)	<b>difference</b> (3)	<b>DNC</b> (2)
<b>Daily</b> (2)	<b>delve</b> (1)	<b>differences</b> (1)	<b>docket</b> (3)
<b>damaged</b> (1)	<b>demand</b> (1)	<b>different</b> (22)	<b>doctor</b> (5)
<b>damages</b> (1)	<b>demanded</b> (1)	<b>difficult</b> (4)	<b>document</b> (47)
<b>D'Ambra</b> (1)	<b>demanding</b> (3)	<b>difficulty</b> (1)	<b>documentary</b> (1)
<b>D'Ambria</b> (1)	<b>demands</b> (1)	<b>digital</b> (1)	<b>documentation</b> (1)
<b>Daniel</b> (149)	<b>DeMarco</b> (1)	<b>diminished</b> (1)	<b>documents</b> (17)
<b>Daniel's</b> (3)	<b>demo</b> (1)	<b>dinner</b> (3)	<b>document's</b> (1)
<b>Danny</b> (87)	<b>demonstrate</b> (3)	<b>direct</b> (9)	<b>doing</b> (85)
<b>Danny's</b> (4)	<b>demonstrates</b> (2)	<b>directed</b> (1)	<b>dollar</b> (2)



<b>Donald</b> (2)	<b>easy</b> (3)	<b>enduring</b> (1)	<b>evidence</b> (46)
<b>donation</b> (3)	<b>eaten</b> (1)	<b>engage</b> (6)	<b>Evidence-based</b> (1)
<b>donations</b> (1)	<b>eating</b> (1)	<b>engaged</b> (11)	<b>exacerbated</b> (2)
<b>donor</b> (7)	<b>ECF</b> (1)	<b>engaging</b> (1)	<b>exact</b> (12)
<b>donors</b> (1)	<b>edgewise</b> (1)	<b>England</b> (13)	<b>exactly</b> (19)
<b>doors</b> (3)	<b>edit</b> (4)	<b>England's</b> (1)	<b>exaggerate</b> (1)
<b>double</b> (1)	<b>edited</b> (1)	<b>English</b> (1)	<b>exam</b> (1)
<b>doubly</b> (1)	<b>editing</b> (3)	<b>enjoy</b> (1)	<b>EXAMINATION</b> (3)
<b>doubt</b> (4)	<b>editor</b> (3)	<b>enlarge</b> (1)	<b>example</b> (18)
<b>download</b> (2)	<b>edits</b> (1)	<b>Enrique</b> (6)	<b>examples</b> (2)
<b>downs</b> (1)	<b>Educate</b> (1)	<b>enter</b> (2)	<b>exception</b> (1)
<b>downward</b> (1)	<b>education</b> (1)	<b>entering</b> (1)	<b>exceptions</b> (1)
<b>DP</b> (1)	<b>educations</b> (1)	<b>entire</b> (8)	<b>excitable</b> (1)
<b>Dr</b> (5)	<b>effect</b> (1)	<b>entirely</b> (5)	<b>excited</b> (4)
<b>draft</b> (4)	<b>effective</b> (3)	<b>entitled</b> (3)	<b>exclusive</b> (1)
<b>drafts</b> (1)	<b>effectively</b> (1)	<b>entrenched</b> (1)	<b>Excuse</b> (8)
<b>draining</b> (1)	<b>effort</b> (3)	<b>environment</b> (2)	<b>execute</b> (1)
<b>drama</b> (1)	<b>Egler</b> (5)	<b>equal</b> (2)	<b>executive</b> (1)
<b>draw</b> (3)	<b>eight</b> (3)	<b>equals</b> (4)	<b>ex-girlfriend</b> (1)
<b>drawing</b> (3)	<b>eight-and-a-half</b> (1)	<b>equated</b> (1)	<b>exhausting</b> (4)
<b>drawn</b> (1)	<b>either</b> (12)	<b>equating</b> (1)	<b>Exhibit</b> (28)
<b>dream</b> (1)	<b>El</b> (1)	<b>equipment</b> (1)	<b>EXHIBITS</b> (3)
<b>dressed</b> (1)	<b>election</b> (4)	<b>equivalent</b> (1)	<b>existed</b> (2)
<b>drew</b> (2)	<b>elements</b> (1)	<b>ER</b> (1)	<b>existence</b> (2)
<b>drinking</b> (3)	<b>Eleven</b> (1)	<b>erase</b> (4)	<b>exists</b> (2)
<b>Drive</b> (7)	<b>Elipse</b> (1)	<b>erased</b> (1)	<b>expand</b> (2)
<b>driven</b> (1)	<b>e-mail</b> (44)	<b>Erica</b> (1)	<b>expanding</b> (1)
<b>drop</b> (5)	<b>e-mails</b> (11)	<b>erroneous</b> (1)	<b>expect</b> (5)
<b>dropped</b> (2)	<b>embarrass</b> (13)	<b>escaping</b> (1)	<b>expectation</b> (1)
<b>dropping</b> (1)	<b>embarrassing</b> (2)	<b>escrow</b> (2)	<b>expectations</b> (1)
<b>drunk</b> (2)	<b>emogis</b> (1)	<b>especially</b> (4)	<b>expected</b> (2)
<b>DuBai</b> (3)	<b>emoji</b> (3)	<b>Esquire</b> (4)	<b>expenses</b> (1)
<b>ducking</b> (1)	<b>emotional</b> (3)	<b>established</b> (7)	<b>experience</b> (10)
<b>due</b> (2)	<b>employ</b> (1)	<b>estate</b> (6)	<b>experienced</b> (3)
<b>duly</b> (3)	<b>employed</b> (2)	<b>Estranimkis</b> (1)	<b>expert</b> (2)
<b>duties</b> (2)	<b>employee</b> (30)	<b>E-S-T-R-A-N-I-M-K-I-</b>	<b>experts</b> (2)
<b>duty</b> (11)	<b>employee/employer</b>	<b>S</b> (1)	<b>expired</b> (1)
<b>dying</b> (2)	(2)	<b>et</b> (3)	<b>Explain</b> (13)
< E >	<b>employees</b> (6)	<b>Europe</b> (2)	<b>explained</b> (10)
<b>E.J</b> (2)	<b>employer</b> (8)	<b>European</b> (1)	<b>explaining</b> (1)
<b>earlier</b> (21)	<b>employer/employee</b>	<b>evaluations</b> (1)	<b>explanation</b> (2)
<b>early</b> (2)	(1)	<b>Eve</b> (1)	<b>exponentially</b> (1)
<b>ease</b> (1)	<b>employers</b> (5)	<b>evening</b> (1)	<b>expound</b> (1)
<b>easier</b> (3)	<b>employment</b> (8)	<b>event</b> (14)	<b>expressed</b> (1)
<b>easiest</b> (1)	<b>employer/employee</b>	<b>events</b> (5)	<b>extended</b> (1)
<b>easily</b> (2)	(1)	<b>Everest</b> (2)	<b>extensive</b> (1)
<b>East</b> (126)	<b>encouraged</b> (1)	<b>everybody</b> (16)	<b>extent</b> (35)
<b>EASTERN</b> (5)	<b>ended</b> (1)	<b>everybody's</b> (1)	<b>external</b> (1)
	<b>ends</b> (2)	<b>everything's</b> (1)	<b>externally</b> (4)

extort (3)	feet (1)	floundering (1)	frivolous (14)
extorted (1)	fellow (8)	flowed (1)	front (9)
extortion (3)	fellows (5)	flowers (5)	fruition (1)
extra (8)	fellowship (1)	Fly (1)	frustrated (1)
extraordinarily (1)	felt (4)	follow (3)	fuck (2)
extraordinary (1)	female (1)	followed (1)	fucking (3)
extremely (1)	fiancee (1)	following (6)	full (3)
eye (2)	fiduciary (7)	follows (1)	full-time (5)
eyes (5)	fight (3)	follow-up (3)	fully (4)
< F >	fighting (2)	fond (1)	fun (7)
fabricate (1)	figurative (3)	Foods (1)	function (1)
fabricated (4)	figure (15)	footage (5)	fundraising (3)
face (8)	figured (1)	forced (5)	funds (3)
Facebook (17)	file (9)	forcing (1)	funny (10)
Facetime (1)	filed (33)	foregoing (1)	fun-type-of-deal (1)
fact (52)	files (1)	Foreign (1)	furious (1)
factor (1)	filing (2)	forever (6)	furniture (1)
factory (1)	film (1)	Forget (11)	further (13)
facts (21)	filming (3)	forgetting (1)	future (5)
factual (2)	filtered (1)	forgive (1)	< G >
fair (43)	final (1)	forgot (1)	gained (2)
Fairbanks (4)	finalized (1)	form (63)	Gala (5)
fairness (1)	finally (1)	format (1)	Gary (25)
faith (1)	finances (1)	former (1)	gas (1)
fake (5)	financial (3)	forth (8)	gather (1)
fall (1)	find (13)	Fortunately (1)	Gavin (2)
falling (1)	finding (3)	Forum (154)	gay (1)
false (17)	fine (28)	Forum's (6)	geez (1)
falsely (7)	fines (1)	forward (3)	general (8)
falsification (1)	finish (17)	forwarded (1)	generally (4)
familiar (5)	finished (5)	forwarding (2)	genuineness (1)
family (6)	Fink (8)	found (11)	George (14)
fancy (1)	fire (12)	foundation (3)	Gerlach (1)
fantasy (1)	fired (31)	Four (6)	Germany (1)
far (9)	firing (6)	Fox (3)	getting (19)
fast (5)	firm (1)	frame (11)	gigabytes (1)
father (2)	first (39)	France (1)	girl (12)
favor (4)	fit (1)	franking (1)	girls (2)
favorable (1)	five (12)	Frankly (1)	girl's (1)
favorably (2)	five-minute (3)	freakin (3)	give (60)
FBI (4)	fix (1)	freaking (3)	given (16)
February (3)	flag (1)	Fred (1)	gives (3)
Federal (2)	fleeting (1)	free (3)	giving (13)
feed (3)	flew (1)	frequently (3)	glad (2)
feel (23)	flight (1)	friend (17)	glass (1)
feeling (5)	flights (1)	friendly (1)	go (141)
feelings (1)	flippant (2)	friends (20)	goal (4)
feels (4)	floating (1)	friendship (4)	goals (2)
	Florida (4)	friendships (1)	

<b>God</b> (3)	<b>half</b> (4)	<b>helped</b> (10)	<b>Huh-uh</b> (1)
<b>goes</b> (10)	<b>half-assed</b> (1)	<b>helpful</b> (4)	<b>Human</b> (7)
<b>going</b> (174)	<b>half-dressed</b> (2)	<b>helping</b> (15)	<b>Hundred</b> (8)
<b>GOLD</b> (17)	<b>hand</b> (4)	<b>helpless</b> (1)	<b>hung</b> (3)
<b>gonna</b> (95)	<b>handed</b> (2)	<b>helps</b> (1)	<b>Hurry</b> (1)
<b>Good</b> (62)	<b>handle</b> (3)	<b>hereunto</b> (1)	<b>hurt</b> (9)
<b>Goodrob</b> (2)	<b>handled</b> (1)	<b>hey</b> (15)	<b>hurting</b> (1)
<b>goof</b> (1)	<b>hands</b> (2)	<b>hierarchy</b> (9)	<b>hurts</b> (1)
<b>Google</b> (7)	<b>hang</b> (3)	<b>higher</b> (3)	<b>husband</b> (8)
<b>Googles</b> (1)	<b>hanging</b> (2)	<b>highlight</b> (1)	<b>husband's</b> (3)
<b>GOS</b> (1)	<b>happen</b> (11)	<b>highlighted</b> (2)	<b>hyperbole</b> (1)
<b>gotten</b> (6)	<b>happened</b> (34)	<b>highlighting</b> (2)	<b>hypothetical</b> (17)
<b>government</b> (2)	<b>happening</b> (16)	<b>highly</b> (1)	<b>Hypothetically</b> (4)
<b>governments</b> (1)	<b>happens</b> (4)	<b>hilarious</b> (1)	< I >
<b>grab</b> (1)	<b>happily</b> (4)	<b>Hill</b> (3)	<b>iCloud</b> (27)
<b>grad</b> (1)	<b>happy</b> (6)	<b>hinge</b> (1)	<b>idea</b> (21)
<b>granny</b> (1)	<b>harass</b> (16)	<b>hire</b> (5)	<b>ideas</b> (1)
<b>grant</b> (7)	<b>harassed</b> (2)	<b>hired</b> (16)	<b>identified</b> (1)
<b>Granted</b> (2)	<b>harassing</b> (4)	<b>hiring</b> (2)	<b>identifies</b> (1)
<b>grantee</b> (1)	<b>harassment</b> (19)	<b>history</b> (4)	<b>identify</b> (15)
<b>grass</b> (1)	<b>harassments</b> (1)	<b>hit</b> (5)	<b>identifying</b> (1)
<b>grassroots</b> (1)	<b>hard</b> (20)	<b>hits</b> (2)	<b>idle</b> (1)
<b>gray</b> (1)	<b>harder</b> (2)	<b>hitting</b> (1)	<b>ignored</b> (4)
<b>Grayson</b> (11)	<b>hardest</b> (1)	<b>Hold</b> (9)	<b>Ill</b> (1)
<b>great</b> (14)	<b>harm</b> (13)	<b>holding</b> (1)	<b>illegal</b> (1)
<b>greater</b> (1)	<b>harmful</b> (1)	<b>hole</b> (3)	<b>IMG_4311.HEIC</b> (1)
<b>Greek</b> (5)	<b>Harry</b> (2)	<b>Holiday</b> (1)	<b>immediate</b> (2)
<b>Greg</b> (200)	<b>hash</b> (1)	<b>hollow</b> (1)	<b>immediately</b> (2)
<b>Greg's</b> (16)	<b>hate</b> (4)	<b>home</b> (7)	<b>immersed</b> (1)
<b>grew</b> (3)	<b>hates</b> (1)	<b>honest</b> (2)	<b>impeachment</b> (3)
<b>gross</b> (2)	<b>hazy</b> (1)	<b>honestly</b> (17)	<b>implement</b> (1)
<b>grounds</b> (3)	<b>HDML</b> (1)	<b>hope</b> (4)	<b>implication</b> (1)
<b>GROUP</b> (4)	<b>head</b> (8)	<b>hoped</b> (1)	<b>implied</b> (2)
<b>groups</b> (2)	<b>header</b> (1)	<b>hopefully</b> (3)	<b>implying</b> (1)
<b>grow</b> (1)	<b>head's</b> (1)	<b>horrific</b> (2)	<b>importance</b> (2)
<b>guarantee</b> (1)	<b>health</b> (1)	<b>horrified</b> (1)	<b>important</b> (6)
<b>guaranteed</b> (2)	<b>healthy</b> (1)	<b>hospital</b> (1)	<b>importantly</b> (1)
<b>guess</b> (35)	<b>hear</b> (26)	<b>host</b> (1)	<b>impossible</b> (1)
<b>guessing</b> (2)	<b>heard</b> (19)	<b>hot</b> (4)	<b>impression</b> (1)
<b>guidance</b> (1)	<b>hearing</b> (8)	<b>hotel</b> (9)	<b>improper</b> (9)
<b>guilty</b> (1)	<b>heart</b> (2)	<b>hour</b> (6)	<b>improvement</b> (1)
<b>gut</b> (2)	<b>hearts</b> (1)	<b>hourly</b> (2)	<b>inappropriate</b> (7)
<b>guy</b> (11)	<b>heatedly</b> (1)	<b>hours</b> (16)	<b>incident</b> (3)
<b>guys</b> (42)	<b>hectic</b> (1)	<b>House</b> (17)	<b>incite</b> (1)
< H >	<b>he'd</b> (1)	<b>hovering</b> (2)	<b>incitement</b> (1)
<b>ha</b> (4)	<b>held</b> (6)	<b>How's</b> (3)	<b>inciting</b> (1)
<b>hacker</b> (4)	<b>hell</b> (6)	<b>hub</b> (1)	<b>include</b> (3)
<b>hair</b> (1)	<b>Hello</b> (1)	<b>huge</b> (5)	<b>included</b> (5)
	<b>help</b> (33)	<b>Huh</b> (1)	

including (6)	instructing (8)	invitation (1)	journalism (1)
income (2)	instruction (11)	invite (1)	journalist (1)
inconsequential (1)	instructional (1)	involve (2)	Joyce (5)
inconsistent (1)	instructions (3)	involved (9)	Juan (1)
incorrect (11)	instructs (1)	involvement (4)	Judge (45)
increase (1)	insubordinate (1)	iPad (21)	Judge's (2)
incredibly (1)	insulted (1)	iPhone (1)	Judy (1)
INDEX (2)	insulting (4)	irate (1)	July (1)
indicate (2)	insults (2)	Ireland (1)	jump (1)
indicates (1)	insurance (1)	irrelevant (2)	June (11)
indication (1)	insurrection (3)	irreparable (1)	Juneish (1)
individual (1)	insurrectionists (1)	irreparable (1)	jury (4)
individuals (1)	intake (1)	Islam (1)	just-for-fun-type (2)
industry (1)	integral (1)	Islamism (1)	Justice (11)
ineffective (1)	intended (1)	isolated (1)	justified (2)
infallible (1)	intense (1)	Israel (1)	justify (1)
infection (1)	intent (3)	issue (17)	
inference (2)	intention (3)	issued (6)	< K >
influencing (1)	intentionally (1)	issues (5)	Kasam (3)
Influential (1)	intents (3)	issuing (1)	Katrina (2)
info (2)	interact (3)	Italy (1)	keep (41)
inform (2)	interaction (4)	its (10)	Keepers (1)
informant (1)	interest (5)	Ivy (1)	Kep (2)
information (71)	interested (10)	IW (8)	kept (3)
infuriated (1)	interesting (2)		Kevin (1)
In-house (1)	interests (1)	< J >	key (1)
initial (2)	intern (5)	Jack (1)	kicked (3)
initials (1)	internal (2)	jacket (1)	kid (4)
injunction (3)	internally (2)	jail (1)	kidding (1)
inner (1)	international (1)	James (4)	kidney (4)
innocent (1)	internet (2)	Jan (9)	kids (31)
innocuous (1)	internship (2)	Janice (1)	kill (1)
input (8)	interpret (1)	January (13)	killed (1)
inquire (1)	interpretation (3)	Jasmine (33)	killers (1)
insane (6)	interrupt (2)	Jasmine's (1)	killing (2)
inside (2)	interview (22)	Jason (1)	Kim (1)
insignificant (1)	interviewed (2)	Jaz (10)	Kimbel (1)
insinuate (1)	interviewing (5)	jcavalier@cozen.com	kind (25)
insinuates (1)	interviews (9)	(1)	kinds (10)
insinuating (3)	intimate (1)	jealous (1)	kiss (1)
insistent (1)	introduce (1)	Jerusalem (2)	kissed (2)
Instagram (4)	introductory (1)	Joanne (1)	knee (1)
instance (5)	intuition (1)	job (71)	knew (38)
instances (5)	inventing (1)	jobs (7)	knocks (1)
instant (1)	invested (2)	jog (1)	know (570)
institution (1)	investigate (2)	John (7)	knowing (3)
institutional (1)	investigating (1)	joke (5)	knowledge (12)
instruct (10)	investigation (2)	Jonathan (1)	known (7)
instructed (5)	investigator (7)	Journal (11)	knows (12)



Kyle (1)	lesson (2)	lodged (1)	manage (6)
< L >	letter (1)	lofty (1)	managed (2)
LA (1)	letters (2)	log (7)	management (1)
labeled (3)	letting (5)	logged (2)	manager (1)
Lack (6)	level (8)	log-in (3)	managing (4)
lady (1)	levied (1)	log-ins (1)	mandated (1)
Lafave (1)	Levy (7)	LOL (1)	Mandeles (2)
laid (2)	LexusNexus (1)	London (13)	manipulated (1)
LANCASTER (1)	liar (4)	long (38)	manipulator (1)
language (1)	Liberty (1)	longer (3)	manufacture (1)
laptop (1)	license (4)	long-term (4)	manufactured (4)
largely (1)	lie (3)	long-time (2)	manufacturing (1)
late (2)	lied (3)	long-winded (1)	marble (1)
latest (1)	lies (2)	look (39)	March (11)
laugh (2)	life (32)	looked (5)	marched (1)
laughed (1)	life's (1)	looking (16)	Mario (1)
laughing (1)	lifestyle (1)	looks (18)	Mark (12)
launching (1)	light (6)	loose (1)	marked (10)
LAW (4)	lighter (1)	loosely (1)	Market (5)
Lawrence (1)	liked (10)	loser (1)	Marnie (29)
laws (4)	likelihood (11)	lost (1)	married (1)
lawsuit (44)	likes (1)	lot (32)	master (1)
lawsuits (5)	limit (1)	lots (6)	Master's (1)
lawyer (10)	limited (4)	loud (1)	match (1)
lawyers (2)	line (12)	love (25)	math (1)
layering (1)	lines (2)	love/hate (1)	Matt (5)
lead (3)	link (3)	loved (3)	matter (26)
leader (4)	Lis (3)	lovely (1)	matters (4)
leading (1)	LISA (54)	lowest (2)	Matthew (3)
league (1)	Lisa's (1)	loyalty (3)	Max (1)
Leah (5)	list (13)	lthe (1)	McDonald (1)
learn (3)	listed (2)	ludicrous (1)	McDonald's (1)
learned (3)	listen (11)	lunch (3)	McGuiness (1)
learning (3)	listing (1)	lying (5)	McMichael (2)
leave (10)	lists (1)	< M >	McNulty (31)
leaving (2)	literal (1)	Ma'am (2)	M-E (1)
Lee (4)	literally (5)	machine (1)	Meal (1)
leering (1)	litigation (3)	mad (2)	mean (159)
left (35)	Litman (1)	magically (1)	Meaning (2)
left-hand (2)	little (42)	mail (3)	means (14)
legal (44)	live (14)	main (1)	meant (12)
legally (2)	lived (2)	Mainen (1)	mechanism (1)
legislation (2)	Lives (2)	maintain (3)	Meckenberg (3)
legit (4)	living (7)	maintained (5)	Meckleberg (4)
legitimate (4)	loathed (1)	major (4)	med (1)
legitimately (1)	lobbing (1)	maker (1)	media (12)
Leigh (1)	lobby (1)	making (26)	medical (3)
lent (2)	locally (4)	man (4)	medication (2)
	location (1)		medicine (2)

<b>meds</b> (2)	<b>missed</b> (2)	<b>National</b> (5)	<b>notify</b> (1)
<b>meet</b> (5)	<b>missing</b> (4)	<b>natural</b> (2)	<b>notion</b> (1)
<b>meeting</b> (14)	<b>mission</b> (4)	<b>nature</b> (1)	<b>November</b> (32)
<b>meetings</b> (1)	<b>mission-oriented</b> (1)	<b>NDA</b> (12)	<b>Number</b> (23)
<b>MEF</b> (106)	<b>missions</b> (1)	<b>near</b> (3)	<b>numbers</b> (9)
<b>MEF's</b> (2)	<b>misstating</b> (2)	<b>neat</b> (1)	<b>numerous</b> (6)
<b>member</b> (1)	<b>mistaken</b> (1)	<b>necessarily</b> (2)	<b>nuts</b> (1)
<b>members</b> (6)	<b>mistakes</b> (1)	<b>necessary</b> (1)	< O >
<b>memory</b> (2)	<b>misunderstanding</b> (1)	<b>neck</b> (1)	<b>oath</b> (3)
<b>men</b> (1)	<b>mob</b> (2)	<b>need</b> (52)	<b>object</b> (96)
<b>mended</b> (2)	<b>Mohammed</b> (2)	<b>needed</b> (11)	<b>objected</b> (2)
<b>mental</b> (2)	<b>Molly</b> (1)	<b>needing</b> (1)	<b>objecting</b> (2)
<b>mentality</b> (2)	<b>mom</b> (3)	<b>needs</b> (4)	<b>objection</b> (180)
<b>mentally</b> (1)	<b>moment</b> (3)	<b>nefarious</b> (3)	<b>objectionable</b> (2)
<b>mention</b> (1)	<b>mom's</b> (1)	<b>negated</b> (1)	<b>objections</b> (16)
<b>mentioned</b> (7)	<b>Monday</b> (2)	<b>Negative</b> (7)	<b>objectives</b> (2)
<b>mentioning</b> (1)	<b>Monday.com</b> (3)	<b>neglect</b> (1)	<b>obligated</b> (2)
<b>merits</b> (4)	<b>Monetarily</b> (2)	<b>negotiations</b> (1)	<b>obligation</b> (3)
<b>mess</b> (1)	<b>monetary</b> (1)	<b>Neil</b> (2)	<b>observe</b> (3)
<b>message</b> (30)	<b>money</b> (52)	<b>Neither</b> (3)	<b>observed</b> (2)
<b>messaged</b> (3)	<b>Money's</b> (1)	<b>nervous</b> (1)	<b>observing</b> (1)
<b>messages</b> (33)	<b>monies</b> (1)	<b>Network</b> (1)	<b>obsessed</b> (1)
<b>messaging</b> (2)	<b>month</b> (10)	<b>networking</b> (1)	<b>obtain</b> (1)
<b>messy</b> (1)	<b>months</b> (20)	<b>never</b> (90)	<b>obtained</b> (1)
<b>met</b> (19)	<b>mooning</b> (1)	<b>nevertheless</b> (3)	<b>obvious</b> (3)
<b>Meyer</b> (9)	<b>moral</b> (2)	<b>new</b> (26)	<b>obviously</b> (2)
<b>Meyers</b> (1)	<b>morning</b> (5)	<b>news</b> (10)	<b>Occasionally</b> (3)
<b>Middle</b> (132)	<b>mother</b> (7)	<b>newsletters</b> (1)	<b>occasions</b> (10)
<b>middleman</b> (1)	<b>mother-in-law</b> (1)	<b>Newsmax</b> (3)	<b>occupies</b> (1)
<b>midnight</b> (1)	<b>motion</b> (6)	<b>nice</b> (4)	<b>occur</b> (3)
<b>miffed</b> (1)	<b>motivation</b> (1)	<b>night</b> (5)	<b>occurred</b> (5)
<b>Mike</b> (3)	<b>motives</b> (3)	<b>nightmare</b> (1)	<b>O'CONNOR</b> (2)
<b>million</b> (7)	<b>mouth</b> (2)	<b>nights</b> (1)	<b>October</b> (7)
<b>mind</b> (13)	<b>move</b> (19)	<b>nine</b> (5)	<b>OD</b> (1)
<b>Mindula</b> (1)	<b>moved</b> (7)	<b>nod</b> (1)	<b>offensive</b> (2)
<b>mine</b> (5)	<b>movement</b> (1)	<b>nominal</b> (3)	<b>offer</b> (2)
<b>minute</b> (15)	<b>Moving</b> (2)	<b>non-attorneys</b> (1)	<b>offered</b> (1)
<b>minutes</b> (21)	<b>multiple</b> (19)	<b>nonsense</b> (4)	<b>offering</b> (1)
<b>misappropriated</b> (5)	<b>Murville</b> (4)	<b>non-stop</b> (3)	<b>offers</b> (1)
<b>misappropriation</b> (1)	<b>mutual</b> (4)	<b>Nope</b> (3)	<b>office</b> (27)
<b>misbehavior</b> (1)	<b>Myers</b> (1)	<b>normal</b> (8)	<b>Officer</b> (2)
<b>Mischaracterization</b> (2)	< N >	<b>normally</b> (2)	<b>official</b> (6)
<b>mischaracterize</b> (1)	<b>name</b> (27)	<b>Notary</b> (3)	<b>officials</b> (1)
<b>mischaracterized</b> (3)	<b>named</b> (6)	<b>note</b> (7)	<b>Oh</b> (40)
<b>mischaracterizing</b> (6)	<b>names</b> (5)	<b>noted</b> (2)	<b>Ohio</b> (2)
<b>mislead</b> (1)	<b>Nancy</b> (1)	<b>notepad</b> (1)	<b>Okay</b> (377)
<b>misleading</b> (3)	<b>narcotics</b> (1)	<b>nother</b> (1)	<b>old</b> (8)
<b>misreading</b> (1)	<b>narrow</b> (1)	<b>Nothing's</b> (2)	<b>Oliva</b> (1)
		<b>notified</b> (1)	

omission (1)	< P >	PENNSYLVANIA (6)	places (1)
once (8)	p.m (13)	penny (1)	placing (1)
one-minute (1)	PA (4)	people (126)	Plaintiff (4)
ones (3)	packages (1)	peoples (1)	plaintiffs (2)
one-time (1)	PAGE (9)	percent (8)	plaintiff's (2)
ongoing (2)	pages (7)	perfect (2)	plan (2)
online (6)	paid (16)	perform (1)	plane (2)
oOo (1)	pain (2)	performance (5)	planing (1)
opened (2)	Painful (4)	perimeter (1)	planned (3)
opening (6)	panel (5)	period (16)	plate (1)
operate (2)	panorama (1)	periods (2)	platform (2)
operates (2)	pants (1)	permission (3)	platforms (2)
operating (2)	paper (2)	permitted (1)	play (3)
operations (1)	papers (4)	person (43)	player (1)
opinion (13)	paperwork (3)	personal (27)	players (2)
opinions (2)	paragraph (7)	Personally (3)	playing (3)
opportunities (1)	paragraphs (1)	personnel (2)	please (16)
opportunity (8)	Pardon (3)	person's (2)	plenty (7)
opposed (2)	Paris (2)	perspective (2)	PLLC (1)
opposite (1)	Parliament (1)	pertaining (2)	Plus (3)
option (2)	part (48)	pertake (1)	Podiatry (1)
oral (1)	Partially (1)	petitioned (1)	point (73)
order (34)	participate (1)	phase (1)	pointed (1)
ordered (1)	particular (7)	Philadelphia (6)	pointing (1)
orders (3)	particularly (1)	Philly (4)	points (3)
ordinary (1)	parties (3)	phone (42)	Police (2)
Oren (2)	parts (2)	phones (2)	policies (1)
organization (13)	party (6)	Photo (6)	policy (7)
organizational (2)	passed (1)	photograph (14)	political (10)
organizations (1)	passing (1)	photos (1)	politically (1)
organize (1)	passion (2)	physical (3)	poor (7)
organized (4)	password (4)	physically (4)	poorly (2)
organizer (1)	passwords (4)	pick (1)	pop (1)
original (2)	Patel (2)	picking (1)	popping (1)
originally (7)	patient (2)	pics (5)	portion (2)
O'Shalim (1)	Patricia (25)	picture (24)	position (16)
outcome (3)	Patrick (2)	pictured (1)	positions (1)
outlet (3)	pattern (1)	pictures (16)	positive (1)
outlets (2)	Paul (2)	piece (7)	positively (1)
outmanned (1)	pay (17)	pieces (2)	possession (2)
output (1)	paycheck (3)	pile (1)	possibility (1)
outside (14)	paying (5)	pipe (1)	possible (3)
outward (2)	payment (1)	Pipes (106)	possibly (2)
overlap (1)	Paypal (2)	Pipe's (1)	post (6)
overreach (1)	PC (1)	Pipes's (1)	posted (2)
overreacted (2)	Pelosi's (1)	pitch (1)	posting (1)
overseeing (1)	pending (3)	placard (1)	posts (1)
Ovi (9)	Penn (1)	PLACE (14)	potential (4)
owns (1)		placed (6)	potentially (2)

pounds (2)	Procedure (2)	publicly-filed (1)	rally (1)
power (3)	procedures (1)	published (1)	Ramen (1)
powerful (1)	proceed (5)	Puerto (7)	ran (2)
PR (1)	proceeding (1)	pull (4)	random (1)
pray (1)	process (2)	pulled (1)	Randy (3)
pre (1)	proclivities (2)	pulling (1)	ranges (1)
precisely (1)	produce (8)	pulp (1)	Rape (11)
preclude (1)	produced (14)	punished (3)	raped (12)
predatory (1)	producing (1)	purchase (1)	rapey (1)
predicated (1)	product (2)	purely (2)	rapist (10)
preempted (1)	production (4)	purpose (3)	Rare (1)
prefer (1)	professional (1)	purposeful (1)	ratting (2)
preliminary (3)	profile (1)	purposefully (1)	reach (5)
prepare (1)	program (4)	purposes (4)	reached (10)
pre-planned (2)	programs (1)	pursuant (1)	reaching (4)
prerogative (1)	progress (2)	pursuing (3)	react (1)
prescribes (1)	progression (1)	push (1)	reaction (6)
PRESENT (4)	prohibit (1)	put (49)	read (100)
presented (4)	project (16)	puts (3)	readily (1)
president (6)	promise (1)	putting (7)	reading (3)
presidential (1)	promised (1)	pyramid (1)	reads (1)
press (16)	promising (2)		ready (5)
pressure (2)	promotion (1)	< Q >	real (15)
pressured (2)	prompted (1)	qualifications (1)	reality (1)
pressures (1)	proof (6)	qualified (1)	realize (3)
presume (1)	proper (7)	qualify (2)	really (60)
pretty (19)	proposal (3)	Quarterly (1)	realm (1)
prevails (2)	propounded (1)	question (248)	reapplied (1)
prevent (2)	prospective (1)	questioned (3)	re-ask (1)
previous (3)	Prosperity (1)	questioning (5)	reason (46)
Previously (2)	Prosser (1)	questions (46)	reasonable (11)
pride (2)	protect (2)	question's (1)	reasonably (2)
priests (1)	protected (3)	quick (6)	reasoning (2)
primary (3)	protecting (1)	quicker (1)	reasons (3)
principle (1)	protection (1)	quickly (6)	recall (12)
principles (1)	protective (1)	quit (8)	receive (1)
print (1)	protest (1)	quite (4)	received (7)
printed (1)	protests (2)	quitting (2)	receiving (1)
prior (22)	proud (21)	quote (11)	Recess (4)
priority (1)	prove (4)	quoted (1)	recognize (4)
prison (3)	proven (1)	quoting (2)	recognized (3)
private (25)	provide (2)		recollection (4)
privilege (9)	provided (5)	< R >	recommend (1)
privy (1)	psychiatric (3)	racketeering (2)	recommendations (1)
probably (42)	psychiatrist (2)	radio (6)	recommended (2)
probation (1)	Public (11)	Rahiem (4)	recommending (1)
probationary (1)	publication (2)	raided (1)	record (85)
problem (17)	publicize (1)	raise (2)	recorded (5)
problems (4)	publicly (4)	raising (1)	recording (13)



recordings (3)	relying (1)	resistent (1)	ring (1)
record's (1)	remainder (1)	resolution (5)	ringing (2)
recount (1)	remaining (1)	resolve (1)	riot (2)
recourse (4)	remains (1)	resolved (3)	riots (1)
recourses (1)	remarkably (2)	resort (2)	rises (1)
red (1)	remember (143)	Resources (6)	RMR (4)
reduced (5)	remembered (2)	respect (10)	RNC (2)
reducing (2)	remembering (1)	respective (1)	Robinson (35)
refer (5)	remotely (1)	respond (6)	Robinson's (6)
reference (7)	remove (8)	responded (10)	role (5)
referenced (3)	removed (5)	responds (3)	rolling (1)
references (2)	removing (1)	response (7)	Roman (77)
referencing (4)	renewed (1)	responses (1)	Roman's (6)
referred (3)	rent (1)	responsibilities (11)	romantic (2)
referring (12)	re-open (3)	responsibility (5)	romantically (2)
refrain (1)	repeat (6)	responsible (5)	room (12)
refreshing (1)	repeated (1)	rest (3)	Rothlinson (1)
refused (1)	rephrase (1)	restate (1)	rough (1)
regarding (2)	replied (1)	restore (1)	routine (1)
regardless (8)	re-populates (1)	restrict (1)	routinely (1)
regret (1)	report (19)	restrictions (1)	RSS (1)
regular (3)	reported (15)	restroom (1)	rule (2)
regularly (1)	REPORTER (19)	result (4)	ruled (4)
regulate (1)	reporters (2)	Resume (37)	rules (3)
regulation (1)	reporter's (2)	resumes (2)	ruling (3)
rehash (1)	Reporting (21)	retained (1)	rulings (1)
rehired (1)	reports (4)	retaliate (2)	rumor (2)
relapsed (1)	represent (13)	retaliating (2)	rumors (3)
related (7)	representation (5)	retaliation (21)	run (6)
relates (2)	Representatives (4)	retaliations (1)	running (2)
relating (4)	represented (3)	retaliatory (9)	runs (2)
relation (3)	representing (2)	retracted (2)	Ryan (1)
relationship (45)	reprimand (9)	retroactively (1)	
relationships (3)	reprimanded (1)	return (2)	< S >
relative (1)	reprimanding (1)	returned (1)	sad (6)
relax (1)	Republican (1)	retweets (1)	safe (4)
relaxing (1)	Republicans (1)	review (14)	saga (1)
release (1)	Republican's (1)	reviewed (3)	sake (4)
released (1)	reputation (4)	revised (1)	salary (7)
releases (1)	request (6)	revisions (1)	Sallavanti (1)
relevance (4)	requested (3)	rewarded (1)	Salman (2)
relevant (8)	requests (4)	REYNOLDS (4)	Sam (5)
relevantly (1)	require (1)	rhetoric (1)	Samantha (2)
relief (1)	requirement (1)	RICO (24)	San (1)
relieve (1)	requirements (1)	rid (5)	Sanchez (28)
relive (2)	requires (1)	ridicule (2)	Sanchez's (2)
re-live (1)	research (1)	ridiculous (8)	Sandman (2)
reluctant (5)	resign (1)	Rieser (1)	sanities (1)
rely (1)	resigned (2)	right (200)	Santa (1)

sappy (1)	self-validation (1)	shotted (1)	soliloquies (1)
sat (2)	send (23)	show (21)	soliloquy (2)
satisfy (1)	sending (12)	showed (7)	solitary (1)
Saturday (1)	sends (2)	showing (6)	solve (2)
Saudi (1)	seniority (1)	shown (1)	somebody (25)
save (4)	sense (10)	shows (1)	somebody's (1)
saved (1)	sensitive (1)	shut (2)	somewhat (2)
saw (19)	sent (41)	shutdown (1)	sorry (40)
saying (58)	sentence (4)	Sid (1)	sort (10)
says (56)	sentenced (1)	side (9)	sorting (1)
scalp (1)	separate (3)	SIDNEY (6)	sound (4)
scattered (1)	separated (1)	sign (11)	sounds (3)
school (11)	separately (1)	signed (9)	source (6)
schools (1)	September (1)	signify (1)	sources (1)
scorned (1)	serious (4)	signing (3)	Southern (1)
scour (1)	served (10)	silence (1)	space (1)
scoured (1)	services (1)	sill (1)	speak (22)
scratch (1)	set (24)	silly (1)	speaker (2)
screaming (1)	Seth (26)	simple (8)	speaking (26)
Screen (19)	seth@DerekSmithLaw	simply (3)	speaks (13)
screenshot (1)	.com (1)	single (4)	special (1)
screenshots (1)	setting (3)	sir (15)	Specialist (2)
screw (1)	settings (1)	sit (6)	specific (8)
scroll (11)	settlement (5)	Sitnick (1)	specifically (8)
scrolling (3)	seven (7)	sitting (17)	specifics (6)
scuttle (4)	seven-hour (1)	situation (13)	specified (1)
seal (4)	seventh (1)	situations (1)	speculate (2)
search (8)	severe (1)	six (6)	speculation (4)
second (25)	sex (18)	skill (1)	Speculative (1)
secondary (2)	sexual (42)	skills (5)	speech (4)
Secondly (3)	sexually (3)	skips (1)	speeches (3)
seconds (3)	sgold@discrimlaw.net	Sky (5)	speechifying (2)
secret (4)	(1)	sleep (6)	spell (1)
secretary (2)	shape (1)	sleeping (6)	spelled (1)
secrets (19)	share (8)	slept (2)	spend (11)
secret's (1)	shared (2)	slow (3)	spending (1)
section (1)	sharp (1)	slowly (1)	spent (5)
sections (1)	shed (3)	small (4)	sphere (1)
sector (1)	she'd (1)	smart (1)	spinning (1)
Secum (2)	shell (2)	SMITH (1)	spiral (1)
secure (1)	Shield (3)	Snapchat (1)	split (2)
security (1)	shiny (1)	sobbed (2)	spoke (13)
see (64)	shirt (2)	social (11)	spoken (13)
seeing (3)	shit (1)	society (2)	spot (1)
seeking (1)	Shocked (5)	sold (1)	spreading (1)
seen (7)	shop (1)	sole (3)	spreadsheet (1)
sees (1)	short (3)	solely (1)	SS (1)
segments (1)	shorter (1)	solid (2)	stabbed (1)
self-esteem (1)	Shot (10)	solidify (1)	Stacy (1)

staff (8)	strange (2)	supervisors (1)	telegrams (1)
stages (1)	strategy (1)	supervisory (2)	telegraph (2)
stamp (1)	stream (1)	supply (1)	television (1)
stamped (1)	Street (21)	support (3)	tell (99)
stamps (1)	streets (2)	supported (1)	telling (31)
stand (1)	stress (1)	supporter (1)	tells (2)
standard (2)	stressful (2)	supports (1)	tend (1)
standing (4)	strike (9)	supposed (13)	tenth (1)
standpoint (1)	string (3)	supposition (1)	tenure (2)
stands (2)	strong (1)	sure (43)	Terio (1)
start (14)	structure (2)	surgery (1)	term (2)
started (27)	struggle (1)	surprise (2)	terms (8)
starting (2)	struggling (1)	surprised (1)	terrible (7)
starts (3)	studied (1)	surveillance (1)	terrorist (2)
state (8)	studies (3)	survive (1)	terrorists (1)
stated (3)	stuff (52)	suspicion (3)	test (1)
statement (10)	stupid (1)	suspicious (6)	testified (16)
statements (10)	stupidest (1)	swear (2)	testify (21)
STATES (4)	subject (11)	sweaty (1)	testimony (43)
stating (3)	subjective (4)	sweet (3)	Texas (12)
Station (5)	submit (2)	swimming (1)	Text (44)
status (1)	submitted (10)	sworn (4)	textbook (1)
stay (7)	subordinate (1)	symptoms (3)	texted (7)
stayed (8)	subscribed (1)	synopsis (1)	texts (3)
staying (3)	substance (1)	system (5)	Thank (6)
stemmed (2)	substantial (3)		Thanks (4)
stenographic (1)	succeed (1)	< T >	theft (2)
stenographically (1)	success (6)	table (1)	Thelma (2)
step (1)	successfully (1)	take (69)	themselves (1)
Stephanie (6)	suck (1)	TAKEN (14)	therapist (3)
stepping (1)	sued (1)	takenI (1)	thereof (1)
Steve (2)	suffered (1)	takes (3)	thing (91)
stick (1)	sufficient (2)	talk (56)	things (124)
stole (7)	suggest (6)	talked (53)	think (230)
stolen (4)	suggesting (2)	talking (99)	thinking (5)
stone (2)	suggestion (1)	talks (5)	thinks (16)
stones (1)	suing (1)	tapes (1)	third (6)
stop (12)	Suite (4)	tarnish (1)	Thirteen (1)
stopped (5)	Sullivan (1)	tasks (3)	Thomas (28)
stopping (1)	summary (1)	Taylor (1)	thought (34)
storage (3)	summer (1)	Taylor's (1)	thousands (2)
store (4)	Sun (1)	T-bone (2)	thread (6)
stored (6)	superior (1)	teach (1)	threat (4)
stores (1)	superiors (2)	team (3)	threaten (2)
stories (2)	supervised (1)	tech (1)	threatened (2)
storing (3)	supervising (4)	technical (1)	threatening (4)
story (6)	supervisor (4)	technicalities (1)	threatens (3)
straight (3)	supervisor/supervisee (1)	technically (2)	threats (1)
straightforward (1)		Telegram (3)	three (25)

<b>threes</b> (1)	<b>transfer</b> (1)	<b>typo</b> (2)	<b>upgrading</b> (1)
<b>threw</b> (1)	<b>transferring</b> (1)	<b>tyrant</b> (1)	<b>uphill</b> (1)
<b>throw</b> (1)	<b>transition</b> (1)		<b>uploading</b> (1)
<b>throwing</b> (1)	<b>transitioning</b> (1)	<b>&lt; U &gt;</b>	<b>upping</b> (1)
<b>thrown</b> (1)	<b>translate</b> (1)	<b>U.S</b> (3)	<b>ups</b> (1)
<b>throws</b> (2)	<b>transmitted</b> (1)	<b>Uh-huh</b> (27)	<b>upset</b> (4)
<b>Thursday</b> (3)	<b>transvestite</b> (1)	<b>ultimate</b> (1)	<b>Upton's</b> (3)
<b>ticket</b> (1)	<b>trap</b> (1)	<b>ultimately</b> (5)	<b>use</b> (19)
<b>tie</b> (2)	<b>trauma</b> (1)	<b>umbrellas</b> (1)	<b>useful</b> (1)
<b>tied</b> (1)	<b>travel</b> (1)	<b>un</b> (1)	<b>user</b> (1)
<b>tier</b> (3)	<b>traveling</b> (1)	<b>unable</b> (1)	<b>usually</b> (2)
<b>Tiffany</b> (4)	<b>treat</b> (2)	<b>unaffiliated</b> (1)	<b>usurper</b> (1)
<b>tight</b> (1)	<b>treated</b> (5)	<b>unaware</b> (1)	<b>usurpers</b> (1)
<b>time</b> (241)	<b>treatment</b> (1)	<b>unbelievable</b> (1)	<b>utter</b> (1)
<b>times</b> (60)	<b>trial</b> (2)	<b>unclear</b> (1)	
<b>tiny</b> (1)	<b>Tricia</b> (21)	<b>uncomfortable</b> (7)	<b>&lt; V &gt;</b>
<b>Tioro</b> (1)	<b>Tricia's</b> (1)	<b>uncontrollably</b> (1)	<b>vacation</b> (5)
<b>tired</b> (2)	<b>trick</b> (2)	<b>underappreciated</b> (1)	<b>vacations</b> (2)
<b>title</b> (29)	<b>tried</b> (6)	<b>undercover</b> (3)	<b>vacillating</b> (1)
<b>titled</b> (1)	<b>trip</b> (1)	<b>underground</b> (1)	<b>valid</b> (1)
<b>today</b> (55)	<b>triumph</b> (1)	<b>undermine</b> (1)	<b>value</b> (1)
<b>Today's</b> (1)	<b>trouble</b> (8)	<b>underneath</b> (2)	<b>various</b> (2)
<b>told</b> (69)	<b>troubled</b> (1)	<b>undershirt</b> (1)	<b>Vasille</b> (3)
<b>tolerate</b> (1)	<b>true</b> (39)	<b>understand</b> (63)	<b>veiled</b> (1)
<b>Tommy</b> (79)	<b>truly</b> (1)	<b>understandable</b> (1)	<b>vendetta</b> (1)
<b>Tommy's</b> (3)	<b>Trump</b> (8)	<b>understanding</b> (12)	<b>vendettas</b> (2)
<b>Tomo</b> (4)	<b>trust</b> (5)	<b>understands</b> (13)	<b>vendors</b> (1)
<b>tomorrow</b> (1)	<b>truth</b> (11)	<b>understood</b> (3)	<b>venue</b> (1)
<b>ton</b> (4)	<b>truthful</b> (5)	<b>undertones</b> (1)	<b>verbal</b> (2)
<b>tone</b> (1)	<b>truthfully</b> (3)	<b>unequivocal</b> (1)	<b>verbalize</b> (1)
<b>tonight</b> (1)	<b>try</b> (21)	<b>unequivocally</b> (1)	<b>verbatim</b> (1)
<b>tons</b> (3)	<b>trying</b> (67)	<b>unfair</b> (2)	<b>versus</b> (4)
<b>toothed</b> (1)	<b>Tuesday</b> (1)	<b>unfortunate</b> (1)	<b>victim</b> (3)
<b>top</b> (14)	<b>tumble</b> (1)	<b>unfortunately</b> (1)	<b>Video</b> (16)
<b>top-down</b> (1)	<b>tunnels</b> (2)	<b>unhappy</b> (3)	<b>Videoconference</b> (1)
<b>topic</b> (4)	<b>turn</b> (2)	<b>unhealthy</b> (1)	<b>VIDEOGRAPHER</b>
<b>topics</b> (2)	<b>turned</b> (16)	<b>union</b> (1)	(15)
<b>Toradol</b> (2)	<b>turns</b> (1)	<b>UNITED</b> (2)	<b>videos</b> (1)
<b>Torio</b> (1)	<b>Tweet</b> (1)	<b>universe</b> (6)	<b>view</b> (5)
<b>Toro</b> (1)	<b>tweets</b> (3)	<b>unnecessary</b> (2)	<b>views</b> (3)
<b>totally</b> (9)	<b>twice</b> (5)	<b>unpaid</b> (1)	<b>Vinny</b> (13)
<b>touched</b> (2)	<b>twist</b> (2)	<b>unquote</b> (1)	<b>violated</b> (2)
<b>trade</b> (23)	<b>twisted</b> (3)	<b>unrelated</b> (5)	<b>violating</b> (1)
<b>trafficking</b> (5)	<b>Twitter</b> (5)	<b>untrue</b> (4)	<b>violation</b> (2)
<b>tragic</b> (1)	<b>two</b> (45)	<b>untruthfully</b> (1)	<b>violence</b> (3)
<b>train</b> (2)	<b>two-and-a-half</b> (1)	<b>untruths</b> (2)	<b>Virginia</b> (1)
<b>training</b> (1)	<b>type</b> (5)	<b>updates</b> (1)	<b>Virus</b> (4)
<b>transcript</b> (7)	<b>types</b> (4)	<b>updating</b> (1)	<b>Visa</b> (6)
<b>transcription</b> (1)	<b>typical</b> (1)	<b>upfront</b> (1)	<b>vis-a-vis</b> (1)



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